

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA,

Plaintiff,

-against-

Case No.

18-cv-15099

SHANT HOVNANIAN et al.,

Defendants.

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Remote Deposition of KAREN GANDOLFO

Thursday, January 28, 2021

Reported by:

Joseph Danyo V

Job No.: 1192

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January 28, 2021  
10:08 a.m.

Remote Deposition of KAREN GANDOLFO taken  
via Zoom before Joseph Danyo V, a Shorthand Reporter  
and Notary Public within and for the State of New  
York.

A P P E A R A N C E S :

U.S. DEPARTMENT OF JUSTICE  
Trial Attorneys, Tax Division  
Post Office Box 227  
Washington, D.C. 20044  
(202)353-9187  
By: ARI KUNOFSKY, ESQ.  
Ari.D.Kunofsky@usdoj.gov  
CATRIONA M. COPPLER, ESQ.  
Catriona.M.Coppler@usdoj.gov

HANAMIRIAN LAW FIRM P.C.  
Attorneys for Nina Hovnanian  
40 Main Street  
Moorestown, New Jersey 08057  
By: JOHN HANAMIRIAN, ESQ  
jmh@hanamirian.com

Also Present:

ELZA GRIGORYAN

1 Gandolfo

2 K A R E N G A N D O L F O, having been first  
3 duly sworn by Joseph Danyo V, a Notary Public, was  
4 examined and testified as follows:

5 EXAMINATION BY MR. KUNOFSKY:

6 Q. Good morning, Ms. Gandolfo. My name  
7 is Ari Kunofsky, and I represent the United  
8 States in the matter of United States versus  
9 Shant Hovnanian. We're taking today's deposition  
10 by electronic means. We've previously obtained  
11 your consent to take this deposition remotely  
12 before you were represented.

13 MR. KUNOFSKY: Before we get started,  
14 I'd just like to ask does anyone at this  
15 deposition have any objection to this  
16 deposition going forward by electronic  
17 means?

18 MR. HANAMIRIAN: No.

19 MR. KUNOFSKY: Okay.

20 Q. Ms. Gandolfo, do you have counsel  
21 present?

22 A. Do I have what?

23 Q. A lawyer present with you?

24 A. Yes.

25 Q. Okay. Who is the lawyer present with

1 Gandolfo

2 you?

3 MR. HANAMIRIAN: It's me, and I'm  
4 turning up her volume. There you go.

5 A. John.

6 MR. HANAMIRIAN: Hanamirian.

7 A. Hanamirian.

8 Q. Okay, and --

9 MR. KUNOFSKY: John, do you want to  
10 make your appearance on the record?

11 MR. HANAMIRIAN: Yes. John  
12 Hanamirian appearing on behalf of Karen  
13 Gandolfo, the witness in this matter. We  
14 also have Elza Grigoryan is in the room,  
15 just so you know.

16 MR. KUNOFSKY: Can we please have her  
17 on camera as well.

18 MR. HANAMIRIAN: Yes. Okay. Well,  
19 she's here. I mean she needs another  
20 laptop.

21 MS. GRIGORYAN: Can I go on on my  
22 phone?

23 MR. HANAMIRIAN: Yes. She can go on  
24 on her phone. She'll go on on her phone.

25 MR. KUNOFSKY: Thank you.

1 Gandolfo

2 MR. HANAMIRIAN: Yes.

3 MR. KUNOFSKY: And I'll ask Elza to  
4 mute just so we don't get the reverb.

5 MR. HANAMIRIAN: Yes.

6 MR. KUNOFSKY: We also have Catriona  
7 Coppler, who is here with me on behalf of  
8 the United States.

9 Q. Ms. Gandolfo, I'd like to lay out  
10 just some basic ground rules. If you don't  
11 understand a question, please let me know. If  
12 you don't hear the question because it gets  
13 garbled in transmission because, you know, video,  
14 let me know.

15 If you need a break, let me know and  
16 I'll be happy to take one. I might ask you to  
17 finish the question that I've asked, answering  
18 the question I've asked before we take that  
19 break.

20 Be sure to answer clearly so the  
21 court reporter can understand. No nodding of the  
22 heads or um-hum's, un-un's. We have to answer  
23 with words so that the court reporter who is here  
24 today can make a clean record. Do you understand  
25 these instructions?

1 Gandolfo

2 A. Yes.

3 Q. Okay. Because we're taking this  
4 deposition virtually, we may run into  
5 interruptions or lags, so I would ask that you  
6 just be patient. If there is a technical issue,  
7 if I get kicked off or if you get kicked off,  
8 please just hold on and we'll try to handle that  
9 technical difficulty as best we can. I have  
10 John's number in case a difficulty arises.

11 Can you please state on the record  
12 that you will not check your phone or any other  
13 electronic device during this deposition without  
14 telling me first?

15 A. Sure.

16 Q. If you have to check, we might ask  
17 you to share what information you've sent or  
18 received. Do you understand that?

19 A. Yes.

20 Q. Okay, and John and Elza are in the  
21 room with you. Is anyone else in the room?

22 A. No.

23 Q. Okay. Are there any documents or  
24 items in front of you right now?

25 A. No.

1 Gandolfo

2 Q. Okay. Do you have any questions  
3 about what is expected today?

4 A. I don't know.

5 Q. All right. I have a couple of  
6 questions I ask all my witnesses. Again, it's  
7 just part of what I need to do to make sure I've  
8 got a clean record here.

9 Is there any reason you're aware of  
10 that you're not suited to testify today?

11 A. No.

12 Q. Okay. Are you on any medications  
13 that might affect your memory or ability to  
14 testify?

15 A. No.

16 Q. Okay. Do you have Alzheimer's,  
17 dementia or another condition that could affect  
18 your memory?

19 A. Not that I'm aware of.

20 Q. Okay. Knock on wood. Have you taken  
21 any drugs, alcohols or other substances in the  
22 past 24 hours which might impede your ability to  
23 answer questions here today?

24 A. No.

25 Q. Anything else that might affect your



1 Gandolfo

2 ability to testify?

3 A. No.

4 Q. Okay. What have you done to prepare  
5 for this deposition?

6 A. Nothing.

7 Q. Okay. Did you speak with anybody to  
8 prepare?

9 A. No.

10 Q. Okay.

11 MR. HANAMIRIAN: Wait a minute.

12 Wait, Ari. Karen, excuse me. Ari, we  
13 spoke. Karen and I spoke on the phone.

14 A. Oh, yes. Sorry.

15 Q. That's okay.

16 A. Yes. I spoke to John.

17 Q. When did you speak with John?

18 A. This morning and once briefly on the  
19 phone.

20 Q. Okay. Did you review any documents?

21 A. No.

22 Q. Okay. Tell me about you. What is  
23 your educational background? Where did you go to  
24 school?

25 A. I went to Brooklyn Academy High

1 Gandolfo

2 School. I did a year and a half at Brooklyn  
3 College and dropped out.

4 Q. Okay.

5 A. And then I just took a job.

6 Q. What job?

7 A. I worked for a trimmings manufacturer  
8 in the city, and I stayed -- I was there until I  
9 got married and had my first son, so maybe  
10 11 years.

11 Q. Okay.

12 A. And then I stayed home for two years  
13 and then went to work at a drug rehabilitation  
14 center as like -- just doing, you know, accounts  
15 payable like writing checks, paying bills.

16 Q. Right.

17 A. And then I worked for Speedus.

18 Q. For who?

19 A. For Speedus --

20 Q. Okay.

21 A. -- NY in Brooklyn. It was a cable  
22 company. I worked for Wireless Cable, and then I  
23 went to them. Sorry.

24 Q. Is Wireless Cable a different  
25 company?

1 Gandolfo

2 A. Yes. They don't exist anymore.

3 Q. Okay. Was it a Hovnanian owned  
4 company or --

5 A. No. No.

6 Q. Okay. When did you get hired with  
7 Speedus?

8 A. '97.

9 Q. And --

10 A. I like to keep my jobs for a long  
11 time.

12 Q. Same. I'm on year 13. It's my  
13 bar mitzvah year for my job.

14 MR. HANAMIRIAN: Mazel tov.

15 Q. All right, so you've been there since  
16 '97. What was your starting role? Tell me about  
17 your time with Speedus.

18 A. Well, I was hired to do the  
19 contractor billing. It was a cable company, and  
20 they had these outside contractors that would  
21 hand in invoices for their -- what their techs  
22 installed, and it was my job to go through all of  
23 that billing to find mistakes. And I found a lot  
24 that they were overcharging, and I'm -- yes,  
25 so...

1 Gandolfo

2 Q. It happens.

3 A. And then when they started laying  
4 people off, I ended up -- I was lucky enough to  
5 still stay, and then I got moved to learn how to  
6 data enter bills in a computer system called  
7 Great Plains that I don't think works anymore,  
8 and then we got moved out to the Hovnanian office  
9 building in Freehold in '08, and then I was still  
10 doing, you know, writing the checks and paying  
11 the bills and doing whatever anybody asked me to  
12 do. I didn't really have a job title.

13 Q. Okay.

14 A. I'm one of these people that I was  
15 willing to learn and accept, okay, my job  
16 description is changed, so I'll do this now.

17 Q. Yes. That's how you keep a job for  
18 23 years.

19 A. Exactly.

20 Q. There you go, so you were at Speedus  
21 and you were doing -- I kind of want to start at  
22 Speedus and then work forward. What was the  
23 Great Plains thing? Is that accounting software  
24 or is that just billing?

25 A. I think it was just billing. I don't

1 Gandolfo

2 know if it had accounting on it or not. I wasn't  
3 involved in that. They had other people doing it  
4 back then.

5 Q. Okay, and then you said there were a  
6 bunch of layoffs. When did that happen?

7 A. Well, when we moved to -- from  
8 Brooklyn to Manhattan, 2000, I think. I don't  
9 really remember what exactly. I just know that  
10 they laid everybody off. They kept maybe 40 or  
11 50 people, and then we moved to the city, and  
12 then -- was it 40 or 50 people? Maybe 30, and  
13 they -- you know, we moved to the city in these  
14 temp offices on I think it was 23rd Street, but I  
15 can't remember, and then eventually we moved to  
16 Tribeca. There was a building there.

17 Q. Right.

18 A. On Desbrosses Street or something,  
19 and --

20 Q. 9 Desbrosses?

21 A. Yes. And then there was just --  
22 there was me, Tom and Steve and maybe three other  
23 people. There was still --

24 Q. Okay.

25 A. -- maybe five or six people, and then

1 Gandolfo

2 there was -- then we moved. They sold the  
3 building, and we had to vacate, so we went out to  
4 Jersey to his -- to the office building in  
5 Freehold.

6 Q. Okay, so when you were at  
7 9 Desbrosses, who were those five people or six  
8 people?

9 A. There was me, Mr. Hovnanian, Tom  
10 Finn, who is deceased now, Steve Quinn, who is  
11 also deceased. There was some guy, but I don't  
12 remember his name. I think his first name was  
13 Carlos, but I don't remember his last name. And  
14 then there was some techie guy that -- Marco.  
15 Marco.

16 Q. Okay.

17 A. But I don't remember their last  
18 names. I'm sorry.

19 Q. That's fine. When you say Mr.  
20 Hovnanian, we've got a couple of those in this  
21 case. Can we do --

22 A. Shant.

23 Q. -- Vahak for Shant's dad and Shant  
24 for Shant?

25 A. Okay. It was Shant.

1 Gandolfo

2 Q. Okay, and then just so that we're all  
3 clear, Nina will be Nina. I'm not trying to have  
4 any disrespect by not using Mr. or Mrs. I just  
5 want to make sure the record is clean.

6 A. All right.

7 Q. Okay, so when you went to  
8 9 Desbrosses, were you then the bookkeeper for  
9 the company?

10 A. I wouldn't really call it that. I  
11 just I entered the bills, and then I paid them,  
12 and Tom was sort of acting as the CFO, and Steve  
13 was the guy I reported to. He was like the guy  
14 in charge who worked with Tom on all the finance  
15 stuff. I just, if they needed a report I'd hit a  
16 button. I don't --

17 Q. Yes, and then -- okay. You moved to  
18 Freehold in '08, you said?

19 A. I think it was '08, yes.

20 Q. And same cast of characters came with  
21 you from --

22 A. No. Steve had died of a heart  
23 attack, and it was just me and Tom, and Shant was  
24 still there in and out, and Carlos was there for  
25 a little while, and then him and Shant had an

1 Gandolfo

2 argument and he disappeared. I don't know. I  
3 don't know what happened.

4 Q. What was Carlos's job?

5 A. What?

6 Q. What was Carlos's job?

7 A. I have no idea.

8 Q. Okay, and then you said, along with  
9 entering data, paying bills, what other stuff  
10 have you done?

11 A. I ran errands. Whatever they asked  
12 me to do. It was like a gal Friday. I just, you  
13 know, if they asked me to go get this, I went and  
14 got that. If they asked me to look up a file, I  
15 went to the file cabinet, I got the file.

16 Q. Okay.

17 A. But I didn't, you know, I don't have  
18 any training in bookkeeping or accounting or  
19 whatever. Just using common sense and following  
20 through.

21 Q. Okay. I mean that's sometimes better  
22 than formal education. Give me a second. I'm  
23 switching up some, so -- switching up my  
24 questions right now. Sorry, so we talked about  
25 putting stuff into data entry and paying bills.



1 Gandolfo

2 You used QuickBooks for this, right?

3 A. No.

4 Q. Okay.

5 A. I used -- the Great Plains was still  
6 working then.

7 Q. Okay. When did the company switch  
8 over to QuickBooks?

9 A. When Tom left -- I don't know whether  
10 he quit or he got let -- fired. I don't know. I  
11 just know --

12 Q. Right.

13 A. -- he wasn't there, and we  
14 temporarily had someone named Glen -- shit,  
15 what's his name? Glen come in and do what Tom  
16 did, the financials and all that other stuff.

17 Q. Okay.

18 A. Oh, Peter Glen. That's it. Peter  
19 Glen. That was his name.

20 Q. Okay.

21 A. But he didn't stay long. He was only  
22 there like maybe a year, two years, and then he  
23 left too.

24 Q. Okay, and then -- but he was --

25 A. I was by myself.

1 Gandolfo

2 Q. -- using QuickBooks, and you took it  
3 over?

4 A. Well, yes. He gave me his log-in but  
5 there wasn't anything to put in, because there  
6 wasn't any -- Speedus wasn't -- had no income or  
7 anything, so --

8 Q. Okay.

9 A. -- there wasn't anything to do.

10 Q. Before we get into too much detail,  
11 Speedus and Speedus NY, are those the same thing  
12 or are those separate?

13 A. Yes. As far as -- yes. One is the  
14 corporation and I think one is LP.

15 Q. Right.

16 A. But I think they are the same. Like  
17 when they -- I remember when they did financials,  
18 it was all under one -- under Speedus Corp.

19 Q. Okay, and you said Speedus LP earlier  
20 was a cable company.

21 A. Yes.

22 Q. Was it still doing cable stuff when  
23 you moved to --

24 A. No.

25 Q. -- Jersey?

1 Gandolfo

2 A. No. No. They shut everything down.  
3 It wasn't working.

4 Q. When did they shut Speedus NY.com LP  
5 down?

6 A. I don't know. I don't know. There  
7 wasn't any business like even before we moved to  
8 Manhattan. When we moved out of the Army  
9 Terminal there was no cable business.

10 Q. Is the Army Terminal Tribeca or --

11 A. No. The Army Terminal was Brooklyn.

12 Q. Okay.

13 A. On 2nd and 50 Something Street. 52nd  
14 Street.

15 Q. Okay, so well before you guys moved  
16 out to Jersey --

17 A. Yes.

18 Q. -- there was no business for Speedus?  
19 That's a yes, there was no business?

20 A. Yes. Yes. There was no business.  
21 Sorry.

22 Q. Again, you've got --

23 A. I know. I forgot.

24 Q. Yes. We have Mr. Danyo here, and it  
25 makes it a little -- you know, we have to make

1 Gandolfo

2 sure he gets a good record.

3 A. Sorry.

4 Q. So if Speedus had no business, what  
5 were you all doing out in Freehold?

6 A. I don't know.

7 Q. So you went to work every day and you  
8 were entering data, taking care of -- you know,  
9 TCB, taking care of business?

10 A. Yes.

11 Q. So what were you doing it for? What  
12 was the business there?

13 A. Well, it was -- it was in -- it was  
14 still in Great Plains.

15 Q. Okay.

16 A. Until Peter Glen left.

17 Q. Right.

18 A. And then nothing ever was entered  
19 ever again because there wasn't any income.  
20 There wasn't any business. There was nothing.

21 Q. Okay.

22 A. And I was told that I had to start  
23 learning how to enter bills on QuickBooks,  
24 because Art wasn't going to be there anymore.

25 Q. Okay.

1 Gandolfo

2 A. Havighorst. I don't know how to say  
3 his last name. It was a German name.

4 Q. We'll go with Art, but tell me, who  
5 is Art?

6 A. Art was Vahak Hovnanian, the dad's  
7 lawyer.

8 Q. Okay.

9 A. He did a lot of stuff for the dad  
10 that I didn't know anything about.

11 Q. Okay, but that's still you're  
12 entering expenses about -- by the way, when was  
13 this? When did Art --

14 A. 2011.

15 Q. Okay. Sorry, and the question was  
16 when did Art leave, and the answer is 2011?

17 A. Yes.

18 Q. Okay, and then --

19 A. I'm pretty sure that's the year.

20 Q. And if you need to estimate and say  
21 it's about 2011, I'm okay with that. Just let me  
22 know you're estimating.

23 A. Yes. Well, that's an estimate. I'm  
24 not really sure if it was 2010 or 2011. If --

25 Q. Okay, and then what were you getting

1 Gandolfo

2 bills for?

3 A. Like Staples or you mean for Speedus  
4 or do you mean for --

5 Q. Well, here, let's do this. You said  
6 that Speedus was shut down.

7 A. Right.

8 Q. Outside of Speedus, were there other  
9 companies that you were working for?

10 A. No.

11 Q. Okay. What about Grand View Cable?

12 A. I started on that. Art showed me how  
13 to enter the QuickBooks and then he left, and  
14 then I was on my own.

15 Q. Okay. What was Grand View Cable?

16 A. It's still -- it's a cable company  
17 that Vahak Hovnanian started, and there is a  
18 senior building, and then there is, it used to be  
19 in the village where he built the old community,  
20 the old folks community.

21 Q. Okay. Grand View gets money by  
22 providing cable to an old folks home?

23 A. Well, yes, but we don't -- at one  
24 point everybody in that village area had our  
25 cable, because there wasn't anybody else.

1 Gandolfo

2 Q. Right.

3 A. Okay? And so did the senior building  
4 in Tinton Falls. So recently I discovered, you  
5 know, because the community, the village  
6 community allowed Verizon and Comcast to come in.  
7 They cut a lot of our lines, because our lines  
8 were in the ground, but they weren't in conduits,  
9 so they were easily cut, so we lost a lot of  
10 customers. So eventually I realized that we were  
11 paying an exorbitant amount of money a month and  
12 for very few customers, so I shut it down.

13 Q. Okay.

14 A. So now we only have the senior  
15 building, so --

16 Q. Okay.

17 A. -- we supplied them with TV.

18 Q. And is the senior building 2500  
19 Tinton Falls?

20 A. Shafto Road, yes.

21 Q. Shafto.

22 A. Yes.

23 Q. Sorry.

24 A. That's okay. It's in Tinton Falls.  
25 I've never been there. I just know the address.

1 Gandolfo

2 Q. Okay. Did you talk to anybody before  
3 shutting down the cable?

4 A. I mentioned it to Nina.

5 Q. Okay.

6 A. And I said this is our best bet in  
7 cutting bills, because we weren't bringing in  
8 enough to cover a lot of bills, so I was trying  
9 to cut things where I could down to bare minimum,  
10 and that was one of the biggest bills. It was  
11 over \$3,000 a month, so...

12 Q. Yes. I was wondering why you guys  
13 were getting that big of a bill from the cable  
14 companies.

15 A. Because at one point it was -- we had  
16 that whole village as customers.

17 Q. Okay.

18 A. So I mean it wasn't -- technically it  
19 kind of evened out or whatever, but I got rid --  
20 I made -- they kind of left me on my own, and I  
21 was running out of operating money, so I just  
22 figured out, do we pay a penalty, and it turns  
23 out that when I brought it up, that was when our  
24 contract ended, so I didn't -- we weren't going  
25 to get a penalty, so I cut it off.



1 Gandolfo

2 Q. Who left you on your own?

3 A. Well, Nina. She didn't really get  
4 back to me, and I was, you know, not getting an  
5 answer, so I needed to make a decision, so I  
6 just, like I said, I used some common sense, and  
7 then it's not working, so we had five customers  
8 left at \$39 a month.

9 Q. That doesn't make a lot of sense  
10 then.

11 A. No.

12 Q. Using the common sense again.

13 A. Yes.

14 Q. Who owned Grand View Cable?

15 A. Vahak Hovnanian owns it, and now the  
16 trust owns it.

17 Q. We have two trusts. Which --

18 A. The VSHPHH trust.

19 Q. Okay. Okay, and Vahak died in 2015?

20 A. I think so.

21 Q. Okay.

22 A. I don't know. I don't remember.

23 Q. That's okay. Let's talk about  
24 Hovbilt. Do you keep QuickBook files for  
25 Hovbilt?

1 Gandolfo

2 A. No, I don't look at them. I just  
3 deal -- I just use Grand View Cable, and the  
4 QuickBooks, and I used to deposit the rent in the  
5 Village Mall, but then they told me not to do  
6 that anymore, to put everything into the Grand  
7 View Cable, the HovSat Inc. account, and then  
8 that's what I used.

9 Q. Who told you to do that?

10 MR. HANAMIRIAN: You know, Ari, I'm  
11 letting it go here, but I do have an  
12 objection based upon the scope of her  
13 testimony, so I don't think that she has  
14 the subpoena that encompasses testimony  
15 beyond into this area, so...

16 MR. KUNOFSKY: That's fine. This is  
17 a 30(b)(1).

18 Q. You can answer that question.

19 MR. HANAMIRIAN: You can, but I mean  
20 other than citing to the rule, what's the  
21 basis?

22 MR. KUNOFSKY: John, she's allowed to  
23 testify to what is in her personal  
24 knowledge.

25 MR. HANAMIRIAN: For what purpose?

1 Gandolfo

2 MR. KUNOFSKY: If you'd like to raise  
3 an objection to privilege, you can. If  
4 you'd like to raise an objection to the  
5 form of the question, you can make it in  
6 an non-argumentative, non-suggestive way.  
7 If you believe I'm harassing her or doing  
8 this to embarrass her, we can go to the  
9 court.

10 MR. HANAMIRIAN: I think that what  
11 I'm suggesting to you is that she doesn't  
12 have the authority to answer the  
13 questions, but because she's in this  
14 setting she's trying to answer the  
15 question, and so she doesn't understand  
16 that she can get in trouble if you make  
17 representations or if you answer questions  
18 on behalf of a third party where you don't  
19 have authorization, and she doesn't have  
20 authorization.

21 MR. KUNOFSKY: Whose authorization  
22 would she need, John?

23 MR. HANAMIRIAN: I have no idea.

24 MR. KUNOFSKY: Okay. Has anybody  
25 come in and made a protective order?

Gandolfo

MR. HANAMIRIAN: No. All I know is  
that --

MR. KUNOFSKY: Has anyone come in to  
file a protective order?

MR. HANAMIRIAN: Well, she's here as the bookkeeper for the two trusts, right?

MR. KUNOFSKY: No. She is here as Karen Gandolfo.

MR. HANAMIRIAN: Well, that doesn't make any sense. I mean you have to have a scope of the subpoena.

MR. KUNOFSKY: No, I don't.

MR. HANAMIRIAN: Well, I mean individuals cannot testify about confidential information. If she's working there as a bookkeeper, she has an obligation to maintain the confidentiality of that data. She doesn't understand that from this dialogue.

MR. KUNOFSKY: She has an obligation  
to testify.

MR. HANAMIRIAN: No. She --

MR. KUNOFSKY: You're not asserting a  
privilege, you're asserting a

1 Gandolfo

2 confidentiality. Confidentiality and  
3 privileges are not the same thing.

4 MR. HANAMIRIAN: You have --

5 MR. KUNOFSKY: If she needs to go get  
6 a protective order, she can.

7 MR. HANAMIRIAN: You have to reach  
8 out to the persons to whom she owes the  
9 confidentiality obligation and get their  
10 consent for her to testify. That comes  
11 first. It's not testify and then  
12 confidentiality. She can't even assert  
13 it, she doesn't have the authority.

14 MR. KUNOFSKY: Okay. Okay.

15 Joseph, before we got off on that, I  
16 asked a question. Can you please re-ask  
17 the question for me.

18 Q. And Karen, can you then answer that  
19 question, please?

20 MR. HANAMIRIAN: Well, I'm  
21 instructing her not to answer the  
22 question, so it doesn't matter.

23 MR. KUNOFSKY: All right. Please  
24 state the privilege you're asserting.

25 MR. HANAMIRIAN: I've just told you

1 Gandolfo

2 why -- the basis.

3 MR. KUNOFSKY: No. Please, are you  
4 stating a privilege?

5 MR. HANAMIRIAN: I don't need to  
6 state a privilege, Ari.

7 MR. KUNOFSKY: Okay.

8 MR. HANAMIRIAN: It doesn't -- just  
9 because the rules say that, if you're  
10 otherwise violating the general sense and  
11 scope of the rules, I don't need to cite a  
12 privilege if it doesn't violate a  
13 privilege.

14 MR. KUNOFSKY: All right.

15 MR. HANAMIRIAN: It's a third-party  
16 issue. It's the same as the subpoena  
17 issue we were discussing.

18 MR. KUNOFSKY: Joseph, can you please  
19 reread the question.

20 Q. Karen, please don't answer the  
21 question. I just have lost kind of my train.

22 (Record read)

23 Q. All right. With regards to rent from  
24 the Village Mall and where you deposit them and  
25 who told you where to deposit them, who

1 Gandolfo

2 instructed you on that?

3 A. Originally it was Shant and then  
4 Nina.

5 Q. Okay. The VS Hovnanian Group, do you  
6 keep QuickBooks files for them?

7 A. No.

8 Q. HovSat, do you keep QuickBook files  
9 for them?

10 A. Yes. HovSat is Grand View.

11 Q. Okay. Do you keep QuickBooks for  
12 Zargis?

13 A. No. I never even touched Zargis.

14 Q. Okay. Do you know who keeps  
15 QuickBooks files for Zargis?

16 A. No.

17 Q. Okay.

18 A. There is nothing on Zargis. Like  
19 they are not doing anything.

20 Q. Do you know when Zargis stopped  
21 operating?

22 A. No. Maybe two -- I don't know. I  
23 don't even want to guess.

24 Q. Before 1990?

25 A. No.

1 Gandolfo

2 Q. Before 2000?

3 A. No.

4 Q. All right. Did they stop operating  
5 before 2010?

6 A. That I don't know.

7 Q. Okay. 2015?

8 A. No. There is nothing going on in  
9 2015.

10 Q. Okay, so sometime between 2010 and  
11 2015 they stopped operating?

12 A. Yes.

13 Q. Okay. When we were shown an image of  
14 the QuickBook files that you have available to  
15 you, there was a company called  
16 KSG@jet.IOcompany. What's that?

17 A. I don't know. That appeared when  
18 Elza and I were trying to download those files  
19 for you, and it just popped up, because they had  
20 asked me for my e-mail address, and then the next  
21 day I noticed that it was there, and I asked  
22 them, and they said, oh, it will go away. Just  
23 you know, it will disappear as, you know, you're  
24 not going to use it, and it's in a couple of  
25 weeks, and then it will go away.



1 Gandolfo

2 Q. Okay.

3 A. I don't know how it ended up there.

4 I didn't do it.

5 Q. Okay.

6 A. It had nothing on it.

7 Q. So you guys have been paying, call it  
8 70 bucks a month for a QuickBooks file that says,  
9 the expense says QuickBooks-Zargis.

10 A. Yes. I've asked about that, and I  
11 got told do not worry about it.

12 Q. Who told you that?

13 A. Shant originally.

14 Q. When did he tell you that?

15 A. Before 2015.

16 Q. Okay.

17 A. I haven't spoken actually to him in  
18 over three years.

19 Q. What happened?

20 A. He just stopped communicating. I  
21 sent e-mails and get no replies. I text, no  
22 replies. Now, I don't hear anything. I don't  
23 know what happened, what's going on. I just talk  
24 to Nina.

25 Q. Okay, and before that, were you

1 Gandolfo

2 talking with Shant about this --

3 A. No. When he decided to answer me.

4 Q. What would you all talk about?

5 A. What I was -- should I -- do you want  
6 me to pay this or do you want me to hold off on  
7 it? What do you want me to -- I need a decision  
8 on this. You know, like do we cancel this phone  
9 bill. And --

10 Q. All right.

11 A. -- sometimes he'd answer and  
12 sometimes he didn't. Most of the time he didn't.

13 Q. For all the companies or for which  
14 companies?

15 A. Well, at that point I was only  
16 working on Grand View.

17 Q. Okay.

18 A. I mean they had a lot of bills and,  
19 you know, phone systems and stuff that weren't  
20 necessary, and I had to figure out how to get out  
21 of paying them.

22 Q. Okay.

23 A. Like canceling contracts or whatever  
24 without penalties.

25 Q. So would you ever take these

1 Gandolfo

2 QuickBook files for Grand View and share them  
3 with -- what would you do with the stuff you were  
4 putting into QuickBooks?

5 A. Nothing. It just stays there. I  
6 enter the bills and then I run the checks.

7 Q. Okay. You didn't send reports to  
8 anybody?

9 A. No. Well, I sent --

10 THE WITNESS: Didn't I send you one?

11 A. I sent one to Elza.

12 Q. Okay. Before then?

13 A. No. No one ever asked me for  
14 anything.

15 Q. Who has access to the QuickBooks from  
16 say like 2011 on? After 2011 who has access to  
17 QuickBooks?

18 A. Peter was gone by then. Art left.  
19 Just me.

20 Q. Why did you keep the QuickBooks? Why  
21 do all this if you're not going to share it with  
22 anybody?

23 A. Say that again.

24 Q. Why would you keep all these  
25 QuickBooks files if you're not going to make

1 Gandolfo

2 reports or do anything with it? Why keep all  
3 these files?

4 A. Because that's a way -- they kept  
5 records, and that's why I would just enter the  
6 bills. I just followed suit.

7 Q. Okay.

8 A. You know, like if I didn't know where  
9 something -- like telephone, you know, Verizon  
10 belongs in telephone.

11 Q. Right.

12 A. Or Direct TV belongs in -- I don't  
13 even know where. It's just automatic. I'm  
14 sorry.

15 Q. Okay.

16 A. You know, like Staples, office  
17 supplies, you know, or if I needed something to  
18 repair, you know, something in the office to  
19 repair and maintenance. I just followed suit.  
20 They would call things for the cable, and it's  
21 marked out or something. I don't know. I  
22 don't --

23 Q. Yes. Okay. You put all the stuff  
24 into QuickBooks. At the end of the month you'd  
25 be writing checks and figure out who to write

1 Gandolfo

2 checks to.

3 A. Yes. When it goes into -- when you  
4 enter it, and then when you go to write the  
5 checks, you go to where it says pay bills in the  
6 pull-down menu, and you go on there, and then you  
7 checkmark each one you want to pay, and then I  
8 put the checks in my printer and they spit them  
9 out.

10 Q. So obviously some of these checks  
11 you're just paying every month kind of routinely,  
12 but in general how did you know which bills to  
13 pay?

14 A. Whatever I had money for, that's what  
15 I paid.

16 Q. Okay, and when you were making the  
17 decision, when it was the proverbial last hundred  
18 bucks, last thousand bucks and you had to decide  
19 do I pay cable, do I pay telephone, do I pay  
20 trash, how would you decide that? Who would you  
21 talk to?

22 A. Well, originally I would e-mail Shant  
23 and ask him which is more important, and if I  
24 didn't get an answer in two days, I made the  
25 decision myself.

1 Gandolfo

2 Q. Okay.

3 A. I took a guess.

4 Q. What about before Vahak's death,  
5 would you e-mail Shant?

6 A. Before Vahak died? Yes.

7 Q. Yes. Okay, and now that Shant has  
8 become nonresponsive, isn't answering your calls,  
9 who do you ask those questions to?

10 A. Nina.

11 Q. Okay, so let me make sure I got the  
12 world of the cases that you worked on. Not  
13 cases. I've been a lawyer too long. Let me make  
14 sure I have the companies right. You work on  
15 HovSat and Grand View, and they are basically one  
16 and the same.

17 A. Right.

18 Q. Speedus and Speedus Corp., and they  
19 are one and the same.

20 A. Say that again.

21 Q. SpeedusNY.com LP and --

22 A. Right.

23 Q. -- Speedus Corp.

24 A. Correct.

25 Q. You don't work on Hovbilt.

1 Gandolfo

2 A. No.

3 Q. You don't work on Zargis.

4 A. No.

5 Q. Are there any other companies out  
6 there that you work on?

7 A. No. Oh, well, the trust. Now,  
8 HovSat, Grand View is now the trust.

9 Q. Okay. Do you know who owns Speedus?

10 A. Excuse me?

11 Q. Do you know who owns Speedus  
12 currently?

13 A. No.

14 Q. Okay. Did you know at one point who  
15 owned Speedus?

16 A. Yes.

17 Q. Who owned Speedus when you knew?

18 A. Shant did, but it was a publicly  
19 traded company, so I'm not quite sure how that  
20 works.

21 Q. Okay. When did Shant own the  
22 company?

23 A. Well, it's always been a publicly  
24 owned company. He was CEO or --

25 Q. Okay.

1 Gandolfo

2 A. I don't think he actually owned it  
3 like a private company. When I went there it was  
4 still a public company.

5 Q. And it stopped being a public company  
6 in 2011 or stopped --

7 A. There is nothing going on, yes.

8 Q. Yes.

9 A. I don't know whether they -- I don't  
10 know anything about filings or anything like -- I  
11 don't know.

12 Q. Okay. Do you know if Shant's role  
13 has changed in the past, you know, since you  
14 moved to --

15 A. No.

16 Q. -- Tinton Falls?

17 A. I don't know.

18 Q. Okay, so as far as you know, his role  
19 has been the same or has it --

20 A. I don't know. I don't talk to him  
21 anymore. Like it's pretty hard to figure out  
22 something if someone is not communicating with  
23 you.

24 Q. I agree with that. Does Nina have a  
25 role in the company?



1 Gandolfo

2 A. Does who?

3 Q. Nina.

4 A. Yes. She's the trustee for the  
5 trust.

6 Q. No. For Speedus. Sorry.

7 A. Oh.

8 Q. Does she have a role with Speedus?

9 A. Not that I know of. I don't think  
10 so.

11 Q. And then other than you, are there  
12 any employees for Speedus?

13 A. No.

14 Q. Do you know if Speedus has a lawyer?

15 A. I don't know.

16 Q. Okay. Do you know where Speedus has  
17 its bank accounts?

18 MR. HANAMIRIAN: And again this is  
19 now in reference to the trust deposition?  
20 I just want to get an understanding.  
21 Speedus has what relationship to this  
22 deposition?

23 MR. KUNOFSKY: Speedus has  
24 transferred over \$150,000 to the trust.

25 MR. HANAMIRIAN: As a loan, so what?

1 Gandolfo

2 If it was PNC Bank, would she testify  
3 about PNC Bank's internal operations?

4 MR. KUNOFSKY: No. That was Zargis.

5 MR. HANAMIRIAN: You just -- you're  
6 using the fact that she has overlapping  
7 roles in entities, whereas if she were  
8 segregated from these entities it would be  
9 totally inappropriate, and you know that,  
10 and so the fact that she's in overlapping  
11 roles in her role as a bookkeeper doesn't  
12 just open the door with respect to all  
13 information for all entities, it has to be  
14 within the scope of the inquiry, and it's  
15 not.

16 You have to get permission from  
17 Speedus's counsel or whomever has the  
18 authority to do this. We can't backdoor a  
19 subpoena.

20 MR. KUNOFSKY: Okay. Are you --

21 MR. HANAMIRIAN: It's not --

22 MR. KUNOFSKY: I'm still not sure --

23 MR. HANAMIRIAN: I can't let it  
24 happen, Ari. It's not appropriate. I  
25 can't let it happen. I can't let this --

1 Gandolfo

2 MR. KUNOFSKY: Then let's stop this  
3 deposition and let's call the judge.

4 MR. HANAMIRIAN: It's not appropriate  
5 for that third party. We're just --

6 MR. KUNOFSKY: Okay.

7 MR. HANAMIRIAN: -- giving  
8 information that's not appropriate for  
9 them. They need to chime in. What if  
10 they wanted to quash a subpoena, and then  
11 she's --

12 MR. KUNOFSKY: Well, that's for them  
13 to do on their subpoena, and I've  
14 explained to both you and Karen that we  
15 were going to be asking questions relating  
16 to these companies.

17 MR. HANAMIRIAN: No, you didn't.

18 MR. KUNOFSKY: It's certainly at the  
19 heart of this case. If you'd like to stop  
20 this deposition, we can go to Judge  
21 Quraishi right now.

22 MR. HANAMIRIAN: Ari, this deposition  
23 is predetermined. I'm saying to you that  
24 you issued subpoenas to these companies.  
25 What are they for?

1 Gandolfo

2 MR. KUNOFSKY: Would you like to go  
3 to Judge Quraishi, and we can have this  
4 issue resolved?

5 MR. HANAMIRIAN: For what? What  
6 issue?

7 MR. KUNOFSKY: Okay.

8 MR. HANAMIRIAN: I mean you're  
9 talking about on the phone?

10 MR. KUNOFSKY: Yes.

11 MR. HANAMIRIAN: How is he going to  
12 possibly understand the issue on the  
13 telephone at this time?

14 MR. KUNOFSKY: Well, looking at Rule  
15 30, no one moved to quash this deposition.

16 MR. HANAMIRIAN: There is no reason  
17 to quash a deposition if you understand  
18 that the content of the deposition would  
19 be in the context of the litigation in  
20 this matter.

21 You have issued separate subpoenas  
22 for Speedus and Zargis. What's the point  
23 of those if there is no -- if she's going  
24 to give all the information in this  
25 proceeding?

1 Gandolfo

2 MR. KUNOFSKY: I asked for documents  
3 from Speedus. I've asked for documents --

4 MR. HANAMIRIAN: It's all testimony.

5 MR. KUNOFSKY: -- from Zargis.

6 Excuse me?

7 MR. HANAMIRIAN: It's all testimony.

8 You have to give somebody the opportunity  
9 to quash. You can't just backdoor it.

10 MR. KUNOFSKY: Okay.

11 MR. HANAMIRIAN: I'm not -- I'm just  
12 telling you. I can't -- I'm not  
13 comfortable with her disclosing it. I  
14 don't care about her in the context of  
15 this. I care about that third party whose  
16 information is compromised as a result.

17 I mean if you want to take that  
18 responsibility, you take it. I think that  
19 there is a claim. You want to assume  
20 responsibility vis-a-vis Speedus and  
21 vis-a-vis any other entity you're asking  
22 about? Responsibility, legal  
23 responsibility for disclosures? Good.  
24 You do it. You say affirmatively that  
25 you're taking that responsibility, that

1 Gandolfo

2 you're confident that that's the case.

3 MR. KUNOFSKY: I'll ask the  
4 questions. If you want to make an  
5 objection, fine. If you --

6 MR. HANAMIRIAN: I'm making --

7 MR. KUNOFSKY: -- think I'm asking an  
8 improper question --

9 MR. HANAMIRIAN: -- an objection to  
10 stop the answer unless the United States  
11 is willing to take responsibility for it,  
12 but I'm not. I'm an attorney sitting  
13 here.

14 MR. KUNOFSKY: All right.

15 MR. HANAMIRIAN: This is third-party  
16 information.

17 MR. KUNOFSKY: Let's take a  
18 five-minute break. I'll be right back.

19 (Recess taken)

20 (Record read)

21 BY MR. KUNOFSKY:

22 Q. All right. Ms. Gandolfo --

23 MR. HANAMIRIAN: Okay. Can we go  
24 back here? Can we go back? Because the  
25 last thing you said was I'll be right

1 Gandolfo

2 back. Does that mean we went on a break?  
3 Does that mean we were -- I mean do we go  
4 forward here? Can we communicate what  
5 we're doing? Like I didn't know to say to  
6 her can she go to the ladies' room. It's  
7 just courtesy. Say I'll be right back  
8 isn't an adjournment of the deposition.

9 MR. KUNOFSKY: We took a few minutes  
10 longer than I expected. I wanted to make  
11 sure that I was -- does anyone need to  
12 take a break right now before we go back  
13 on the record?

14 MR. HANAMIRIAN: We don't need to.  
15 I'm just saying you guys would proceed so  
16 that we can communicate with one another  
17 so we know what's going on.

18 THE COURT REPORTER: Are we on the  
19 record?

20 Q. Okay, so as we go forward, Ms.  
21 Gandolfo, you understand you're still under oath,  
22 correct?

23 A. Excuse me?

24 Q. You understand you're still under  
25 oath?

1 Gandolfo

2 A. Yes.

3 Q. Okay. It seems like a silly  
4 question, but there have been cases where people  
5 have said, oh, I didn't realize when I came back  
6 it was the same thing, so that's why I ask the  
7 question. Again, I'm still --

8 A. Okay.

9 Q. These are all the things -- you know,  
10 the things I do are sometimes -- seem silly are  
11 because at some point at some time somebody said  
12 something, and it's just --

13 A. Okay.

14 Q. -- being careful.

15 A. Okay.

16 Q. Okay. You had said previously  
17 Speedus and Speedus NY are the same company as  
18 far as --

19 A. Yes.

20 Q. Okay.

21 A. As far as I know, yes.

22 Q. Okay, so that means the same  
23 questions about who are the owners, officers and  
24 attorneys would be the same for the two?

25 MR. HANAMIRIAN: Objection as to



1 Gandolfo

2 form, but go ahead and answer.

3 A. Yes. I don't -- I don't know who  
4 their lawyer is or if they have one. I just know  
5 that it was a publicly owned company, so I'm  
6 not -- I don't know. I don't know if they have  
7 an owner.

8 Q. Okay. Does Speedus have a bank  
9 account at Morgan Stanley?

10 MR. HANAMIRIAN: Objection.  
11 Instructing the witness not to answer on  
12 the same basis as before your break.

13 MR. KUNOFSKY: Are you asserting a  
14 privilege?

15 MR. HANAMIRIAN: On the same basis as  
16 before the break.

17 MR. KUNOFSKY: Are you asserting a  
18 privilege?

19 MR. HANAMIRIAN: If I were asserting  
20 a privilege, Ari, you'd know, unlike the  
21 break --

22 MR. KUNOFSKY: Okay.

23 MR. HANAMIRIAN: -- when we didn't  
24 know.

25 MR. KUNOFSKY: Confidentiality is not

1 Gandolfo

2 the same as privilege under the Federal  
3 Rules. All you've asserted is it's  
4 confidential financial information. I am  
5 willing to say that I will not put this  
6 deposition on the record for one week so  
7 that these companies can come in and seek  
8 a protective order if they deem it  
9 necessary.

10 MR. HANAMIRIAN: You have to serve  
11 them.

12 MR. KUNOFSKY: That's how we deal  
13 with financial privilege.

14 MR. HANAMIRIAN: You have to serve  
15 them. They don't know that there is a  
16 deposition or that you're waiting a week  
17 or whatever else. I have no  
18 communication. We don't represent them.  
19 We don't have any relationship at all.

20 MR. KUNOFSKY: Okay. Are you  
21 asserting -- are you instructing her not  
22 to answer on behalf of those companies?

23 MR. HANAMIRIAN: She doesn't have the  
24 authority. I can't make it any clearer.  
25 Because she works there -- if she worked

1 Gandolfo

2 at Shop Rite she can't answer questions  
3 about Shop Rite for you either. It's not  
4 appropriate.

5 MR. KUNOFSKY: Okay.

6 MR. HANAMIRIAN: There is a  
7 confidentiality obligation. Unless you  
8 can tie in the transaction and ask about a  
9 single -- you want to ask about the loan  
10 transaction, that's fine. If you want to  
11 ask about all of their underlying  
12 information, that's why you have a  
13 subpoena. You know that.

14 MR. KUNOFSKY: Okay. Thank you.

15 Q. Karen, have there been transfers from  
16 Speedus's bank accounts to the Pachava Trust and  
17 VSHPHH Trust?

18 A. Say that again.

19 Q. Have there been transfers from any  
20 bank accounts for Speedus to or from Pachava, one  
21 of the trusts?

22 A. Pachava?

23 Q. Yes.

24 A. Yes.

25 Q. Okay. What about VSHPHH, have there

1 Gandolfo

2 been transfers from Speedus to or from VSHPHH?

3 A. I haven't written any from there  
4 when -- I haven't written any from the VSHPHH  
5 account.

6 Q. Okay. What about to or for the  
7 benefit of VSHPHH?

8 THE COURT REPORTER: Repeat that  
9 question. Sorry, I didn't get it. What  
10 about --

11 Q. What about to or from between a  
12 Speedus account and HovSat Grand View, have there  
13 been transfers --

14 A. Yes.

15 Q. -- between -- okay. Has the Pachava  
16 Trust received funds from a bank account at  
17 Morgan Stanley that's held in the name of  
18 Speedus?

19 A. I don't know, because I don't really  
20 have access to the Pachava account. I have  
21 checks that Nina has signed.

22 Q. Okay.

23 A. That if I have to pay something for  
24 the house, I can make it out.

25 Q. What about to the other side of that

1 Gandolfo

2 transaction, did you have access to the Speedus  
3 side of that transaction?

4 A. No.

5 Q. Okay. Were you involved in setting  
6 or verifying transfers between Shant or Speedus  
7 relating to expenses of the house at  
8 520 Navesink?

9 A. I don't understand.

10 Q. Did you have any involvement when  
11 expenses of the house at 520 Navesink were paid?

12 A. Yes. Sometimes it would have -- it  
13 would come from one -- the company.

14 Q. Okay.

15 A. The garbage I think we paid for and I  
16 think there is an alarm.

17 Q. Okay. Who paid for that?

18 A. Well, HovSat, I wrote a couple of  
19 times. HovSat did it. And I think this last  
20 year it came out of the Pachava account, but I  
21 really don't remember offhand.

22 Q. Okay. When it was coming out of the  
23 HovSat account to pay Pachava, who told you to  
24 make those payments?

25 A. That's the way it was set up. I

1 Gandolfo

2 don't have -- I didn't have access to anything  
3 else, and it had to be paid.

4 Q. Okay. Who did you go to before you  
5 made those payments?

6 A. Well, I tried to go to Shant before  
7 he stopped talking to me and couldn't get an  
8 answer or he would say yes, okay, pay it. And  
9 then after that it was Nina.

10 Q. Okay. I want to make sure I'm clear  
11 on this. You said Shant stopped talking to you  
12 about three years ago?

13 A. Yes. Three, four. It was almost  
14 like right after his dad died. Like right when  
15 he was really sick. I didn't see Shant. I  
16 didn't really hear from him.

17 Q. So the dad died in 2015, and his mom  
18 was still alive afterwards, so do you think it's  
19 been the last five, six years that you haven't  
20 really talked to him?

21 A. I would say three or four maybe. You  
22 know, because I went to the service they had at  
23 the Hovnanian school for his dad, you know, as a  
24 sign of respect.

25 Q. Absolutely.

1 Gandolfo

2 A. And I saw him, but I didn't really  
3 talk to him. I mean I said I was sorry and  
4 stuff, but you know.

5 Q. That's okay.

6 A. But we didn't talk about business.

7 Q. Okay, and then after the dad's  
8 funeral service, did you have contact with Shant?

9 A. Not really. He --

10 Q. Okay.

11 A. Maybe he might have answered me once  
12 or twice, but I don't remember when or why.

13 Q. Okay.

14 A. He stopped communicating. I mean I  
15 kept trying. I probably had e-mails that I sent  
16 to him, but got no answers.

17 Q. Let's try this, okay. Do you know  
18 when we filed the lawsuit in this case?

19 A. Do I know what?

20 Q. When the United States sued Shant and  
21 everybody else in this case, do you know when  
22 that occurred?

23 A. I don't know when it started.

24 Q. Okay.

25 A. I know it's probably been around for

1 Gandolfo

2 years, but I don't...

3 Q. The next question was going to be do  
4 you know if it was before or after this lawsuit  
5 that you stopped hearing from Shant? Okay.

6 A. Oh, I forgot. I don't know. I don't  
7 know.

8 Q. And that's fine, and I would have to  
9 make sure we got a good record.

10 A. I know. Sorry.

11 Q. It's okay. Do you have an account  
12 where you're authorized to sign with an  
13 international broker?

14 A. Yes. He asked me to do that, but I  
15 don't -- I've never accessed it. I've never done  
16 anything with it. He asked me to do it, and  
17 honestly I forgot all about it, and I should have  
18 asked him to take my name off of it, but...

19 Q. And it's Shant that we're talking  
20 about when you said --

21 A. Yes.

22 Q. Okay.

23 A. Yes. Sorry.

24 Q. Do you know what that account was  
25 for?



1 Gandolfo

2 A. No.

3 Q. Okay. Do you know why he wanted it  
4 in your name rather than his own or in a business  
5 name? Do you know why he had you open up the  
6 account rather than him?

7 MR. HANAMIRIAN: Object to form, but  
8 you can answer.

9 A. I asked, and I got told don't worry  
10 about it.

11 Q. Okay. Let me rephrase the question  
12 to deal with the objection. Did Shant tell you  
13 why he wanted you to open the account rather than  
14 him doing it directly?

15 A. No.

16 Q. Wait. Did you ask him?

17 A. Yes. I asked him. I asked why do  
18 you need me, and he said just please do it for me  
19 and, you know, don't worry about it. And I  
20 trusted him, so I didn't worry about it, and I  
21 forgot about it, and I shouldn't have, so that's  
22 on me.

23 Q. Okay. Did you give him your user  
24 name and password for that account?

25 A. Did I what?

1 Gandolfo

2 Q. Did you give him your user name and  
3 password for that account?

4 A. No. I never logged onto it.

5 Q. Okay. There are transfers that say  
6 you authorized it. Did you do that or did Shant?

7 A. No. I did not do that.

8 Q. Okay. There are accounts for Speedus  
9 at JP Morgan Chase including the payroll account.

10 A. That's the --

11 Q. Who currently -- yes.

12 MR. HANAMIRIAN: Ari, let me just  
13 instruct --

14 Q. Who currently has control over those  
15 accounts?

16 MR. HANAMIRIAN: Ari, wait one  
17 second. Let me just instruct her again  
18 that until you finish your question to  
19 answer, because you're overlapping, and  
20 it's not good for the record.

21 THE WITNESS: Sorry.

22 MR. KUNOFSKY: Thank you.

23 MR. HANAMIRIAN: Wait until Ari is  
24 done --

25 THE WITNESS: Okay.

1 Gandolfo

2 MR. HANAMIRIAN: -- completely and  
3 then answer.

4 THE WITNESS: Okay.

5 Q. It's hard with the video. If this  
6 was in person it would be in person and not on  
7 video, so I --

8 MR. KUNOFKSY: Thank you, John.

9 MR. HANAMIRIAN: Yes.

10 Q. For the JP Morgan Chase accounts, who  
11 has control over those accounts?

12 A. I think Shant.

13 Q. Okay, and do you have control over  
14 those accounts? Can you write checks on those  
15 accounts?

16 A. No.

17 Q. Okay. How do you get your payroll  
18 paid?

19 A. I tell them, okay, you need to put  
20 money in the account, the payroll account. Then  
21 I call ADP, and ADP runs my check, and I get my  
22 check.

23 Q. Okay.

24 A. Sometimes they are late, sometimes  
25 they are not.

1 Gandolfo

2 Q. Did you just check your watch to see  
3 if they were late on paying payroll this week?

4 A. It was -- no.

5 Q. It's okay. Sorry.

6 A. My husband gave me a Fitbit, because  
7 I have a tendency to get upset, so I watch my  
8 heart rate.

9 Q. Okay. Do you want to take a minute  
10 to take a breath? Are you okay?

11 A. Yes, can I please? Because it's  
12 getting really fast.

13 Q. Yes.

14 MR. KUNOFSKY: Let's take a minute.  
15 Let's take a two-minute break.

16 MR. HANAMIRIAN: Okay. Thanks.

17 (Recess taken)

18 BY MR. KUNOFSKY:

19 Q. And, Karen, you understand you're  
20 still under oath?

21 A. Yes.

22 Q. I'd like to talk about the house at  
23 520 Navesink for a little bit. Okay, and when I  
24 talk about that, whose house is that?

25 A. The trust.

1 Gandolfo

2 Q. Okay. Which trust?

3 A. The Pachava Trust.

4 Q. Okay, and who lived there?

5 A. Hilde and the kids.

6 Q. Okay.

7 A. And Shant once in a while.

8 Q. Okay. Why just Shant once in a  
9 while?

10 A. Because he was always traveling.

11 Q. Okay. When he wasn't traveling  
12 that's where he went?

13 A. Well, sometimes he stayed there.  
14 Sometimes he slept in his dad's office.

15 Q. Okay. Where is his dad's office?

16 A. The office building in Freehold.

17 Q. Okay, and we've been talking about  
18 Freehold. That's 1 Dag Hammarskjold?

19 A. Hammarskjold, yes. Hammarskjold.

20 Q. Thank you. All right, and sometimes  
21 we'll call that the Village Mall during this.  
22 Those are all the same thing?

23 A. What?

24 Q. It's also the Village Mall?

25 A. Yes.

1 Gandolfo

2 Q. Okay. When did Hilde and the kids  
3 live at 520 Navesink?

4 A. I don't know when they moved in. I  
5 know that they moved out. Hilde moved to Norway.

6 Q. Okay.

7 A. The whole family moved to Norway.

8 Q. Do you know when they moved to  
9 Norway?

10 A. I don't remember. I don't remember  
11 what year it was. It was -- I know it was after  
12 the dad died, but before -- was it before the  
13 mother died or maybe it was around then.  
14 Honestly, I don't know. I really don't know. I  
15 can't remember.

16 Q. That's fine. How did you know that  
17 the house was in a trust?

18 A. Hilde was the original trustee on it.

19 Q. Okay.

20 A. It's always been a trust, as far as I  
21 know.

22 Q. Okay.

23 A. I don't think -- from the time it was  
24 built --

25 Q. Okay.

1 Gandolfo

2 A. -- it's always been in a trust, but I  
3 don't know when that was.

4 Q. I'm asking it to just kind of trace  
5 back how you know what you know. How did you  
6 know it was in a trust? Did Hilde or Shant tell  
7 you or somebody else?

8 A. I probably overheard it with Hilde  
9 and Shant when they would talk.

10 Q. Did they ever tell you why it was in  
11 a trust?

12 A. No.

13 Q. Okay.

14 A. I mean, Nina had mentioned that it  
15 was for the kids.

16 Q. Okay. When did she say that?

17 A. I think it's when I first started  
18 having to deal with her.

19 Q. Okay, and that brings me to the next  
20 question. Hilde was the original trustee. Did  
21 you deal with --

22 A. Yes. Hilde --

23 Q. -- Hilde as the trustee?

24 A. -- took care of the --

25 MR. HANAMIRIAN: Let him finish.

1 Gandolfo

2 THE WITNESS: Oh, I'm sorry.

3 MR. HANAMIRIAN: Sorry. Go ahead.

4 MR. KUNOFSKY: I was done with the  
5 question. She can answer.

6 A. Could you say it again then?

7 Because, sorry.

8 Q. What was Hilde's role with the trust  
9 when was she involved?

10 A. She was the trustee from the time the  
11 house was built.

12 Q. Did she ever stop being the trustee?

13 A. Yes. When they got divorced.

14 Q. Okay. Do you know about when they  
15 got divorced?

16 A. No.

17 Q. Okay. Was it during the time you  
18 were still talking with Shant?

19 A. Yes, because he said that Hilde is no  
20 longer the trustee and that Nina is going to take  
21 over.

22 Q. Did Shant ever mention that or did  
23 you ever know that Peter was a trustee, Peter  
24 Hovnanian?

25 A. I don't even know who Peter is.



1 Gandolfo

2 Q. Okay.

3 A. I never met Peter.

4 Q. Okay, and when did Shant tell you  
5 that Nina was taking over for, I may have just  
6 asked you, but Nina took over, in your mind,  
7 after Hilde and Shant got divorced?

8 A. Yes.

9 Q. Okay.

10 A. That's my understanding.

11 Q. Right. When they got divorced, were  
12 Hilde and Shant living in the U.S. or were they  
13 living in Norway or Europe?

14 A. As far as I know, in Norway.

15 Q. Okay. Okay, and then did the kids  
16 and Shant come back?

17 A. No.

18 Q. Okay. Do you know if the divorce was  
19 after his mom died?

20 A. I don't remember.

21 Q. Okay. You said Shant occasionally  
22 slept in his dad's office. Was this for months  
23 at a time, days at a time, a night here or there?

24 A. I don't really know. I would just  
25 know that someone was there, you know.

1 Gandolfo

2 Q. Okay. Was it for months at a time or  
3 a day here or there?

4 A. I would just notice on a day, because  
5 I didn't go in every day. I don't -- like I only  
6 was going in three times a week.

7 Q. That's something I missed. Let me  
8 back up about eight steps. You say you're going  
9 in three days a week. When did that start or  
10 when has that been?

11 A. I did that -- I've been doing that  
12 for the last three or four years.

13 Q. Okay, and then before that, were you  
14 there every day?

15 A. Yes.

16 Q. Okay, so in the last three or  
17 four years though Shant hasn't been talking to  
18 you.

19 A. No.

20 Q. Has he been in the office?

21 A. No.

22 Q. Okay.

23 A. No one has been there except me.

24 Q. Okay, so before that three, four-year  
25 period, did Shant sleep in the office?

1 Gandolfo

2 A. He might have. I would notice that  
3 things were moved. I don't -- I can't swear that  
4 he was there, but I assumed that he was there.

5 Q. Like --

6 A. Because I never saw him, so...

7 Q. What time do you normally get into  
8 the office?

9 A. 7:30, 8 o'clock.

10 Q. So Shant would have been out of the  
11 office by 7:30, 8?

12 A. Yes.

13 Q. Wow.

14 A. It might have been him. It could  
15 have been the technician. He also has access to  
16 the office, but he's usually not there.

17 Q. Who is the technician?

18 A. Kevin.

19 Q. Morrison?

20 A. He does the cables, fixes the cable  
21 for us.

22 Q. That's Kevin Morrison?

23 A. Yes.

24 Q. Okay. I mean is there a bed in that  
25 office?

1 Gandolfo

2 A. No. But in his dad's office there is  
3 a couch.

4 Q. Okay. So would you see like Shant's  
5 blanket out or what would you see that was off?

6 A. The alarm wouldn't be on.

7 Q. Ah.

8 A. Or, you know, but there are other  
9 people who had keys to the main door that don't  
10 work there anymore and never gave their keys  
11 back, so eventually, because it was freaking me  
12 out, I changed the code on the alarm.

13 Q. Okay.

14 A. Because I didn't know who it was. I  
15 assumed it was Shant, but I don't know, because  
16 nobody else was supposed to come in.

17 Q. Okay.

18 A. I don't know.

19 Q. How often would you see this, the  
20 alarm off? Was it every day for months on end or  
21 was it --

22 A. No. No. No. No. No.

23 Q. Okay.

24 A. Just once in a while it would be off  
25 whenever I turned it on.

1 Gandolfo

2 Q. Okay, and then the rest of the time  
3 Shant was either traveling or at home?

4 A. Yes. A lot of time he was just  
5 traveling.

6 Q. Okay, and have you been out to the  
7 house?

8 A. Yes.

9 Q. Tell me about it.

10 A. What do you mean?

11 Q. Like big, small, nice?

12 A. It's big.

13 Q. Okay.

14 A. It's fairly nice.

15 Q. Okay.

16 A. It's a little bit more house than I  
17 like.

18 Q. Makes sense. It's a lot of cleaning.  
19 Do you know how many bedrooms, bathrooms?

20 A. Four and the older son's bedroom over  
21 the garage. That's five.

22 Q. Okay. Is it a guest house or a pool  
23 house that they have?

24 A. It's a guest house.

25 Q. Okay.

1 Gandolfo

2 A. At least that's what they call it.

3 Q. Okay. Why did they ask you to come  
4 out to visit? Why would you be going out?

5 A. To pick up the mail and put it inside  
6 and go through -- get rid of the garbage mail and  
7 make sure that, you know, go upstairs, make sure  
8 that everything is still locked, because  
9 sometimes Vahak would come and go and come and  
10 go, and windows would be unlocked, and I would  
11 have to lock them.

12 Q. When you say Vahak there, do you  
13 mean --

14 A. The son.

15 Q. -- the son? Okay. We'll just have  
16 to be careful about that one, because there are  
17 two of them. So was Shant getting mail at that  
18 house?

19 A. No. A lot of it was -- unless --  
20 from the IRS there was mail, but Nina got mail  
21 there. Hilde still got mail there. The kids got  
22 mail there.

23 Q. All right. Where did Shant's mail  
24 other than the IRS mail go?

25 A. The office.

1 Gandolfo

2 Q. Okay, and where did you send Shant's  
3 mail?

4 A. I didn't. It just stays in a box.

5 Q. Where is the box?

6 A. In my office.

7 Q. When was the last time Shant picked  
8 up his mail?

9 A. He didn't pick it up when he was  
10 here.

11 Q. Okay, so has it been a couple of  
12 years since he's been --

13 A. Yes. Yes.

14 Q. And --

15 A. But I don't get too much anymore, so.

16 Q. Okay. When was the last time you got  
17 some mail for Shant?

18 A. From you guys. The IRS or whatever.

19 Q. Yes. I was about to say I don't  
20 remember sending anything to Shant, but that's a  
21 whole other --

22 A. Yes. The IRS.

23 Q. What did you do when you got that  
24 mail?

25 A. I just put it in the box.

1 Gandolfo

2 Q. And did you e-mail Shant, hey, people  
3 from the IRS are bugging you?

4 A. No.

5 Q. Okay.

6 A. I get -- I got tired of e-mailing him  
7 and getting no response.

8 Q. Okay. Other than going to pick up  
9 mail and make sure the property is secure, any  
10 other reason to go out there? Did you go to  
11 visit, say hi to people? Anything like that?

12 A. Well, when Nina is in, I would go  
13 meet her there sometimes or I would go to check  
14 up on the son, Vahak.

15 Q. Okay.

16 A. I mean he is still a kid.

17 Q. How old is Vahak?

18 A. He was born in '93. Maybe he's 25  
19 now. 24.

20 Q. Okay.

21 A. To me that's still a kid.

22 Q. Okay, yes. I would say kid, but an  
23 adult legally, but, yes. I get it. Does Vahak  
24 still live at the house?

25 A. Yes. When he was -- he wasn't there



1 Gandolfo

2 when he was in school.

3 Q. Okay, and did Shant ever give you  
4 instructions about paying bills related to the  
5 house?

6 A. No. Everything is I think on  
7 automatic, it's out of the Pachava account.

8 Q. What about earlier on like years ago?

9 A. Yes. There was some mingling or, you  
10 know, like maybe the account didn't have any  
11 money in the account at the time, and we'd have  
12 to, one of the other accounts would have to pay  
13 it.

14 Q. And how was that decision made? Who  
15 made it?

16 A. Well, when I was in communication  
17 with him and he would say, okay, can you pay it  
18 out of this? Can you pay it out of the HovSat  
19 account? Do you have enough money? Yes, and I  
20 would pay it.

21 Q. Okay, and he's Shant?

22 A. Yes. Sorry.

23 Q. And this question is going to sound  
24 weird, but I'm just going to ask it. Why would  
25 you listen to him? Why would you follow those

1 Gandolfo

2 instructions?

3 A. Well, because technically, I don't  
4 know, he was my boss before he decided to flake  
5 off somewhere. I mean he was the person -- there  
6 wasn't anybody else to ask.

7 Q. Okay, so when Shant said pay this  
8 house expense, you'd say okay?

9 A. Well, yes. What else am I supposed  
10 to say? No. I mean I'm sorry, that sounded --

11 Q. Yes. No. The questions are a  
12 one-way street here. I ask and you answer. But  
13 I get the point you're making, which is from your  
14 point of view, he was the guy in charge?

15 A. Yes.

16 Q. All right. You said a lot of the  
17 payments were on auto pay. What payments are you  
18 talking about?

19 A. The Verizon bill, the electric, and  
20 I'm pretty sure the gas is on auto. I think they  
21 are all on auto.

22 Q. How was that set up?

23 A. What?

24 Q. How was that set up? Who set that  
25 up?

1 Gandolfo

2 A. I don't know.

3 Q. Okay. Did Shant have control over  
4 the auto pay or the utility?

5 A. No. Hilde did. Hilde had Pachava.

6 Q. Okay. I'm going to show you an  
7 exhibit right now. It's part of what was  
8 produced to me in this case in discovery. And  
9 I'm going to show you a page that starts -- it's  
10 going to be a part of the document. I've marked  
11 it as Pachava 19 in a prior deposition, and it  
12 goes from page 3707 up to 3706, so it's kind of  
13 backwards, so...

14 A. I don't --

15 Q. Do you see the document that is in  
16 front of you? You have a document in front of  
17 you. What do you have in front of you?

18 A. I don't know. I was just --

19 MR. HANAMIRIAN: A printout, it's the  
20 printout of the document.

21 MR. KUNOFSKY: Okay.

22 A. I'm looking to see what -- I don't  
23 know how this works.

24 Q. Here if you look in the lower  
25 right-hand corner, it should have page numbers

1 Gandolfo

2 that have HOVPROD --

3 A. Okay.

4 Q. If you go to 3707 will be there, or  
5 if you look up at the screen, you should see it  
6 on your screen.

7 MR. HANAMIRIAN: Are you sure it's  
8 19, Ari?

9 MR. KUNOFSKY: Yes.

10 MR. HANAMIRIAN: Okay. All right.  
11 We've got it. Thank you.

12 MR. KUNOFSKY: Okay.

13 Q. So on page 3707, did Nina send you  
14 this e-mail from FirstEnergy?

15 A. Yes.

16 Q. And it's talking about the bill for  
17 the 520 Navesink River Road property?

18 A. Yes.

19 Q. Okay. Let's flip back a page to 3706  
20 in the lower right-hand corner. Are you there?

21 A. Yes. She gave -- Nina gave me  
22 supposedly the user and the password to log into  
23 the utilities.

24 Q. Right, so let's start kind of at the  
25 bottom of this e-mail chain, right? Is that

1 Gandolfo

2 Nina's e-mail?

3 A. Yes. That's Nina's e-mail.

4 Q. Okay, and she said NJNATFAS user  
5 name. What's NJNATFAS?

6 A. NG -- where is that?

7 Q. Here, look up at your screen for a  
8 second. Right there.

9 A. I think that's New Jersey National  
10 FirstEnergy maybe.

11 Q. It might just be a typo?

12 A. Yes.

13 Q. Okay. No problem.

14 A. Because that's either just -- it's  
15 either the electric or the gas.

16 Q. Okay, and --

17 A. It must be gas.

18 Q. Okay, and JCPL is the electrical?

19 A. Yes. Yes. Yes, so that's the gas.

20 Q. Okay. What is the user name for that  
21 account?

22 A. For which? The gas?

23 Q. Sorry. The gas.

24 A. It says Shantus.

25 Q. All right. Do you think it could be

1 Gandolfo

2 Shant US like Speedus is Speedus US?

3 A. No. I think that that was a pet name  
4 in his family.

5 Q. For Shant?

6 A. Yes.

7 Q. Okay.

8 A. At least I think so. I don't know.

9 Q. And then the password, Think Cool?

10 A. Yes.

11 Q. Have you seen that password  
12 elsewhere?

13 A. Yes. The password would probably be  
14 the same for the electric, the JCPL.

15 Q. Right, but is this a password that  
16 Shant uses?

17 A. I don't know. That's the one Nina  
18 gave me.

19 Q. Okay, and then if we go up to  
20 January 16th, 2019, that e-mail, that's from you,  
21 KSG@jet.IO, right?

22 A. Right.

23 Q. And you said "After looking at the  
24 Telegram text he sent you, the reason I couldn't  
25 log in was you wrote a 1 instead of an L in the

1 Gandolfo

2 word 'cool,' so I had to pay the gas with the  
3 HovSat debit card."

4 A. Okay.

5 Q. When you said "After looking at the  
6 Telegram text he sent you."

7 A. He forwarded me something that I'm  
8 assuming, which is probably wrong, that it was  
9 Shant, but I don't know.

10 Q. Okay. Do you still have that  
11 Telegram communication?

12 A. I don't know.

13 Q. Okay. Are you on Telegram with Nina?

14 A. Do I what?

15 Q. Do you use Telegram, that app?

16 A. Yes.

17 Q. Okay. Do you have it on a mode that  
18 would say delete this text?

19 A. No.

20 Q. Okay, so you would still have this  
21 text message from Nina to you from Shant?

22 A. Probably.

23 Q. Okay. Has John or anyone else  
24 from -- or Nina asked you for your texts?

25 A. No.

1 Gandolfo

2 Q. Okay. Just out of curiosity, what is  
3 FoxRocks2? Does that have any meaning to you,  
4 for the JCPL password?

5 A. No.

6 Q. Okay. Give me a second. So in that  
7 e-mail, you said that "The gas company wouldn't  
8 help me because I'm not authorized on either  
9 account. When she asked me my name, I pretended  
10 to be Vahak." I'm assuming you mean the dad?

11 A. Yes.

12 Q. All right. Do you know who had  
13 access to the account?

14 A. No.

15 Q. Okay. The next sentence you said,  
16 "So either you or Shant need to freaking call  
17 them and authorize me." Do you think Shant or  
18 Nina had the authorization there?

19 A. I didn't know who. It was just very  
20 frustrating, because I was told to pay it, and I  
21 couldn't get anywhere, so I got annoyed.

22 Q. That's fine. It's okay. We're all  
23 people. We're all human. All right. Let's go  
24 to this one. Let's look at this one really  
25 quick. This will be quick.



1 Gandolfo

2 (KSG Exhibit 2, Document bearing  
3 number Morgan Stanley 5326, was so marked  
4 for identification, as of this date.)

5 Q. All right. I'm showing you KSG 2,  
6 which is a Morgan Stanley 5326 document, and  
7 we're just going to -- you sent an e-mail back in  
8 2014. Is that your e-mail address and Hilde's  
9 e-mail address at the bottom?

10 A. Okay. What did you ask me?

11 Q. Those e-mail addresses, are those  
12 yours and Hilde's?

13 A. Yes.

14 Q. Okay, and you said to her that, "Here  
15 is the bill for the lawn company for the house  
16 and yours and Shant's AAA membership and  
17 invoice." The house you're talking about is  
18 520 Navesink?

19 A. Yes.

20 Q. And then Hilde passed that along to  
21 the bankers?

22 A. I guess. My job was to send it to  
23 Hilde.

24 Q. Okay. Did you ever have an instance  
25 where Hilde disagreed with Shant about what

1 Gandolfo

2 expenses should be paid from the trust?

3 A. No.

4 Q. Okay.

5 A. At least I don't remember.

6 Q. And as far as the AAA, why was that  
7 getting paid out of the trust?

8 A. I don't know.

9 Q. Okay. Who told you to have Shant's  
10 AAA membership be paid by the trust?

11 A. No one. Whatever came -- whatever  
12 bills that were for Hilde and him or the house, I  
13 would scan to Hilde, and then Hilde took -- did  
14 whatever she did.

15 Q. Okay, and then how did you know to do  
16 that? How did you know to send that stuff to  
17 Hilde?

18 A. Because Hilde told me to send it to  
19 her.

20 Q. Do you know if Shant had a credit  
21 card with Bank of America?

22 A. I don't remember whether he had one  
23 or it was one of his parents', but I know I sent  
24 something to him.

25 Q. Okay.

1 Gandolfo

2 A. But I don't know when. It wasn't  
3 recent.

4 Q. Yes. No. These are 2013 to 2015  
5 payments right now when we're talking about this  
6 credit card. Does that sound --

7 A. That might be about right.

8 Q. Okay. What about a credit card with  
9 Citi or debit card with Citi? There was a  
10 payment made in 2015 on that. Do you know if  
11 that was for Shant or for somebody else?

12 A. I don't know.

13 Q. Okay, and \$78,000 roughly was paid to  
14 Chase?

15 A. How much?

16 Q. 78,000 between 2013 and 2015 from  
17 Pachava to Chase. Do you know who would have had  
18 a credit card with Chase?

19 A. No.

20 Q. Okay. Tell me when you're ready to  
21 take a break. I can go all day, but let me know  
22 when to take a break, okay?

23 A. Okay, yes.

24 Q. So we've been talking about the  
25 Pachava Trust for a bit. Let's take a break now,

1 Gandolfo

2 and we'll switch over to organize it before a  
3 good stopping point before lunch, okay? Let's do  
4 this one little topic.

5 We had talked briefly about Zargis.  
6 Do you know who owns Zargis Medical company?

7 A. No. I do know that they did some  
8 kind of patent thing with 3M, but other than  
9 that, I don't.

10 Q. Okay. Do you know who was in charge  
11 of Zargis?

12 A. No.

13 Q. Okay. Do you know what Shant's role  
14 with Zargis was?

15 A. No.

16 Q. Okay. Was he a boss or was he just a  
17 consultant, employee? Do you have any sense of  
18 that?

19 A. I don't know. I didn't really deal  
20 with Zargis. I know that there was a guy John  
21 Calasi, but I don't know what their -- and Peter  
22 Hodge, but I don't know what their titles were or  
23 what they did, but I thought Zargis -- I don't  
24 know. I seem to remember hearing that when they  
25 filed, I don't know, some kind of taxes with

1 Gandolfo

2 Speedus, that Zargis came under that, so I don't  
3 know. Like an umbrella something, I don't know  
4 what that means, but I remember hearing that.

5 Q. Like a holding company or a parent  
6 company?

7 A. Possibly.

8 Q. Okay. Do you know who was the lawyer  
9 for Zargis or who is the lawyer for Zargis? Do  
10 you know who their lawyer is?

11 A. No. I have no clue.

12 Q. Do you know why funds were  
13 transferred between Zargis and either to or for  
14 the benefit of Pachava?

15 A. No.

16 Q. Okay. Do you know if Nina has any  
17 role with Zargis?

18 A. I don't think so. I don't know, but  
19 I don't think so.

20 Q. Do you know where Zargis has a bank  
21 account?

22 A. No.

23 Q. Okay. Speedus transferred funds from  
24 Zargis in 2017. Do you know why?

25 MR. HANAMIRIAN: Was it related to

1 Gandolfo

2 the trust? Was it a transfer for the  
3 trust purpose or was it just a transfer?  
4 Can you identify with specificity the  
5 transfer you're questioning about?

6 MR. KUNOFSKY: I would say it does.  
7 I would say it ultimately goes to pay a  
8 trust expense.

9 MR. HANAMIRIAN: Well, I'll object to  
10 the lack of the foundation, and then she  
11 can answer.

12 A. Can you ask me that again? I'm  
13 sorry.

14 Q. All right.

15 A. I'm really sorry.

16 Q. No. It's a difficult process. I get  
17 that. Speedus transferred \$150,000 to Zargis in  
18 2017. Do you happen to know why that transfer  
19 occurred?

20 A. No.

21 Q. Did you ever hear Shant talking about  
22 the real estate taxes related to the house?

23 A. No. I know that they -- they weren't  
24 paid for a while, but...

25 Q. Do you know how that was resolved?

1 Gandolfo

2 A. No, I don't know if it was.

3 Q. Okay, and this is real estate, not  
4 federal income taxes or anything. Just the real  
5 estate taxes.

6 A. Yes. I just don't know. I don't  
7 know.

8 Q. Okay.

9 MR. KUNOFSKY: Can we do just a  
10 20-minute break for lunch?

11 MR. HANAMIRIAN: Sure.

12 MR. KUNOFSKY: Okay.

13 (Lunch recess: 12:11 p.m.)  
14  
15  
16  
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22  
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25

1 Gandolfo

2 Afternoon Session

3 12:39 p.m.

4 K A R E N G A N D O L F O, having been previously  
5 duly sworn, was examined and testified further as  
6 follows:

7 EXAMINATION (Continued)

8 BY MR. KUNOFSKY:

9 Q. Hey, Karen. You understand you're  
10 still under oath, right?

11 A. Yes.

12 Q. Okay. I'd like to switch over to the  
13 VSHPHH Trust for a little. What is the VSHPHH  
14 Trust?

15 A. They own the office building and I  
16 think pieces of property.

17 Q. Okay. Does it own anything else?

18 A. Not to my knowledge.

19 Q. Okay. What is its relationship with  
20 HovSat and Grand View? How does that work  
21 together?

22 A. Well, the bank account was HovSat  
23 Inc., and Grand View was the cable company that  
24 used that account.

25 Q. Okay, and then what I'm going to call



1 Gandolfo

2 the Village Mall because it's easier than saying

3 1 Dag --

4 A. Yes.

5 Q. -- Hammarskjold, the Village Mall, it  
6 also used the HovSat account, right?

7 A. Yes. Until they set up the actual  
8 bank account for the trust.

9 Q. Okay. Other than using HovSat's bank  
10 account, is there any other role between HovSat  
11 and the Village Mall?

12 A. No.

13 Q. Okay. Are you aware of any  
14 management agreement between HovSat and the  
15 Village Mall?

16 A. No.

17 Q. What is your role with HovSat?

18 A. Pay its bills.

19 Q. I'm going to put all the companies  
20 into the word "HovSat," so instead of saying  
21 HovSat, Grand View, you'll understand that we're  
22 just talking about HovSat.

23 A. Yes. It was just pay the bills and  
24 write the checks.

25 Q. Okay, and what about with the VSHPHH

1 Gandolfo

2 Trust, what is your role there?

3 A. The same thing. Enter, you know,  
4 like make sure the building doesn't fall down.

5 Q. That might be a big task one day.

6 A. Yes.

7 Q. Who hired you for HovSat Grand View?  
8 How did you get involved with that?

9 A. Art left and it got dumped on me.

10 Q. And that's Art Havighorst?

11 A. Yes.

12 Q. Am I even close to pronouncing that  
13 right?

14 A. Yours is as good as mine. I have  
15 trouble with his last name too.

16 Q. Okay.

17 A. Havighorst or something.

18 Q. Okay, and what about with VSHPHH, how  
19 did you get that role?

20 A. It just took over from HovSat.

21 Q. Okay.

22 A. There is no banking going on with  
23 HovSat now.

24 Q. Okay. Who do you communicate with  
25 about the VSHPHH trust?

1 Gandolfo

2 A. Nina.

3 Q. Okay. What about in the past, have  
4 you communicated with anyone else?

5 A. Years ago it was Shant.

6 Q. Okay, and when you were communicating  
7 with Shant, what would you talk about?

8 A. Whether do I pay this or not.

9 Q. Okay, and you would take his  
10 instruction about the VSHPHH trust?

11 A. Yes, because the trust is the  
12 building, and the bills come in. They need to be  
13 paid.

14 Q. What was your understanding of  
15 Shant's role with the trust?

16 A. He had no understanding. When we  
17 started using the trust by that name itself, he  
18 had nothing to do with it. It was only Nina.

19 Q. Okay, so before then, the trust and  
20 HovSat were one and the same?

21 A. Yes. I think.

22 Q. And then --

23 A. I don't know.

24 Q. Okay.

25 A. I don't know when -- I don't know --

1 Gandolfo

2 Q. Okay.

3 A. -- when it was put in there.

4 Q. Okay. I'm not worried so much about  
5 the when, I'm worried about the how.

6 A. That I have no clue about.

7 Q. I might have the wrong short  
8 question. Maybe it's the what. Let me see if I  
9 got it right. Before a certain point, HovSat and  
10 VSHPHH were basically the same thing, and then at  
11 a certain point they split into two separate  
12 things?

13 A. I don't know. I just know that in  
14 QuickBooks it was Grand View, but the bank  
15 account said HovSat Inc., and the next thing I  
16 know they set up an account for the trust, and I  
17 wasn't to use the HovSat Inc. anymore, I was  
18 supposed to use the trust, and that's all I got  
19 told. That's all.

20 Q. Okay.

21 A. So I said fine.

22 Q. And Nina told you that?

23 A. Yes.

24 Q. Okay. Did she tell you why?

25 A. No.

1 Gandolfo

2 Q. Did you ask?

3 A. No.

4 Q. Okay. Why not?

5 A. Basically I didn't care.

6 Q. Okay. What was Shant's role at  
7 HovSat before the VSHPHH accounts were set up?

8 A. He didn't really have a role per se,  
9 because it was when -- before Art left, I had to  
10 meet him at the bank and put my name on the  
11 account.

12 Q. Okay, and then --

13 A. So I could sign the checks. And  
14 Shant was nowhere around for that.

15 Q. Okay, and then if there were  
16 transfers between companies and HovSat before the  
17 split, what records should we have of those  
18 transfers? Like what records do you have of  
19 those transfers?

20 A. Whatever is in QuickBooks, I guess.

21 Q. Okay, so if there was a transfer  
22 from, as just an example, Zargis into HovSat,  
23 there would be nothing outside of QuickBooks to  
24 record that? There wouldn't be --

25 A. No.

1 Gandolfo

2 Q. You don't have copies of contracts or  
3 loan documents or those?

4 A. No.

5 Q. No?

6 A. I don't have any access to Zargis.

7 Q. Okay. No, but I'm saying if there  
8 was a transfer into HovSat, you have access to  
9 the HovSat records, right?

10 A. Yes, but I'm -- because I didn't do  
11 bank recs.

12 Q. Okay.

13 A. So if I was told that there was a  
14 transfer in there or whatever, and honestly if I  
15 remembered to do it, I would enter it, and  
16 sometimes not. Sometimes -- because I didn't do  
17 the bank recs, so everything was kind of up in  
18 the air, so I'm not perfect, so I'm sure I missed  
19 something.

20 Q. So this is part of my job of  
21 translating lawyer and accounting and all that  
22 stuff into English. When you say bank recs, what  
23 do you mean?

24 A. What they call when you take the bank  
25 statements and whatever is entered in there in --

1 Gandolfo

2 Q. Okay.

3 A. -- the QuickBooks and reconcile it so  
4 that there is one number. I don't do that.

5 Q. Okay. Do you automatically download  
6 stuff into QuickBooks from the banks? Like do  
7 you take in the statements or do you manually  
8 enter it all?

9 A. Everything is manual. I don't --  
10 there is nothing automatic about it.

11 Q. Okay, so when there was a transfer  
12 from company A into HovSat, whether it be Speedus  
13 or Hovbilt or whatever, how would you know about  
14 that and how would you know to put that in?

15 A. Well, sometimes I would log in and  
16 check the actual balance in the bank account, and  
17 if there was something in there that I didn't  
18 recognize, I would try and figure out what it was  
19 or where it came from, like if there was a  
20 deposit, a transfer made, a wire transfer, but I  
21 will say I wasn't really great at making sure  
22 that was entered into QuickBooks.

23 Q. Okay. We see a lot of the QuickBooks  
24 entries, and we'll go through them in a bit. A  
25 lot of these entries say just transfer from this

1 Gandolfo

2 account. Could you tell if that was a loan or a  
3 gift or did you know what it was for?

4 A. No. I would just -- if they are in  
5 there, it would be because I saw the transfer,  
6 and there was a name attached to it, and I would  
7 just enter it that way like as a deposit.

8 Q. Okay.

9 A. I don't know. It would just say  
10 transfer from this company or I would throw it  
11 into due to, due from or whatever.

12 Q. Okay. Other than the existence of a  
13 transfer, you have nothing to back it up like --

14 A. No. No.

15 Q. -- no invoices or anything?

16 A. Un-un.

17 Q. Okay, so you have check signature  
18 authority on the VSHPHH account.

19 A. Yes.

20 Q. How do you use that authority? Do  
21 you get general instructions from Nina or is it  
22 every transaction you have to get her approval?

23 A. No. She did it so that I could  
24 write -- I could pay the bills and just cut the  
25 checks for the bills that needed to be paid like



1 Gandolfo

2 the electrics and the phone and cell phone and  
3 stuff.

4 Q. When did Nina start making decisions  
5 for VSHPHH?

6 A. Two years ago she started asking me  
7 stuff.

8 Q. Okay, and before then, who made the  
9 decisions?

10 A. Me.

11 Q. Okay, and if you wanted to get  
12 authorization from somebody, who would you go to?

13 A. Nina.

14 Q. Even before she got involved?

15 A. Well, I would try and e-mail Shant,  
16 but as I said, he wouldn't answer, and --

17 Q. Okay.

18 A. -- I would perhaps figure it out.

19 Q. So your first stop for the VSHPHH  
20 trust would have been Shant?

21 A. Yes.

22 Q. Did he ever authorize --

23 A. Well, not when it became -- see, I  
24 don't know what you mean when -- because Grand  
25 View, HovSat Inc. and the trust are really all

1 Gandolfo

2 one.

3 Q. Okay, so --

4 A. You see, this is --

5 Q. -- more than two years ago when  
6 HovSat was just one thing and not two separate  
7 things, who did you go to for instructions?

8 A. Shant.

9 Q. Okay.

10 A. Until he stopped communicating.

11 Q. Do you know what HovSat was meant to  
12 do?

13 A. No.

14 Q. Okay. Do you know if it ever  
15 operated a business on its own separate from the  
16 Village Mall?

17 A. No.

18 Q. Okay. Do you know who the  
19 decision-makers for HovSat were?

20 A. Vahak Hovnanian, the dad.

21 Q. Okay, and then after the dad died, so  
22 after 2015?

23 A. I don't know.

24 Q. Okay, and did Shant ever have a role  
25 with the company?

1 Gandolfo

2 A. No.

3 Q. Okay. You received a lot of  
4 transfers into QuickBooks from either Omnibox or  
5 Omniverse. What can you tell me about that?

6 A. Just that he told me to put it on the  
7 data service center or data -- yes, and that was  
8 it.

9 Q. And just so that we're clear, who is  
10 he?

11 A. Shant.

12 Q. Okay. Do you know what that meant?

13 A. No.

14 Q. Over time he received \$700,000, is  
15 that correct?

16 A. I don't know.

17 Q. Give me one second.

18 A. I know he got like approximately  
19 9,000 a month.

20 Q. Okay.

21 A. But I don't know for how long or when  
22 it started.

23 (KSG Exhibit 5, Omnisat joint venture  
24 agreement dated 11/1/2017, was so marked  
25 for identification, as of this date.)

1 Gandolfo

2 Q. Okay, and let me pull up -- can you  
3 look at KSG 5, and I can put it up on the screen  
4 if that would just be --

5 A. What is it?

6 Q. It's an Omnisat joint venture  
7 agreement dated 11/1/2017.

8 A. I've never seen this.

9 Q. Okay. In the first line it says  
10 "This is between HovSat at 2500 Shafto Road,  
11 Tinton Falls."

12 A. That's the senior building.

13 Q. Okay, and --

14 A. Where --

15 Q. Let's go to the page that I've  
16 marked, let's see.

17 Here we go. HOVPROD 125. Are you  
18 familiar with Shant Hovnanian's signature?

19 A. Yes.

20 Q. On page 125 is Shant signing on  
21 behalf of HovSat as an authorized signature? Is  
22 that --

23 A. Yes.

24 MR. HANAMIRIAN: I mean I object to  
25 the foundation. She's not a party to,

1 Gandolfo

2 but --

3 THE WITNESS: I'm sorry.

4 MR. HANAMIRIAN: -- I object.

5 MR. KUNOFSKY: I'm sorry. I couldn't  
6 hear the objection.

7 MR. HANAMIRIAN: Yes.

8 You can answer though.

9 MR. KUNOFSKY: John, I couldn't hear  
10 your objection. You were a little off.

11 MR. HANAMIRIAN: I apologize. I  
12 object on the basis of lack of foundation.  
13 I mean she's not --

14 MR. KUNOFSKY: I missed the last  
15 part. You said lack of foundation and  
16 then something else.

17 MR. HANAMIRIAN: That's it. I said  
18 she could answer.

19 MR. KUNOFSKY: Okay.

20 Q. You're familiar with Shant's  
21 signature?

22 A. Yes.

23 Q. You've seen him sign lots of stuff?

24 A. Not lots of stuff. I know his  
25 signature.

1 Gandolfo

2 Q. Okay, and how do you know his  
3 signature?

4 A. Because I've seen him sign a couple  
5 of stuff.

6 Q. Okay.

7 A. Like --

8 Q. Go ahead. No. Tell me the stuff  
9 that he's signed that you've seen.

10 A. A check. Check.

11 Q. Okay.

12 A. I don't have -- when we were on --  
13 never mind.

14 Q. And that's Shant's signature?

15 A. Yes, sir.

16 Q. Okay. HovSat has an account at  
17 Affinity Federal Credit Union, right?

18 A. Correct.

19 (KSG Exhibit 6, Document bearing  
20 numbers Affinity 1348 through 1383, was so  
21 marked for identification, as of this  
22 date.)

23 Q. Okay. Look at KSG 6. I'll pop it  
24 up.

25 A. Okay.

1 Gandolfo

2 Q. And this is page Affinity 1348 to, a  
3 lot of pages, 1383. I'd like you to look at the  
4 first page, please. There are two people listed  
5 with --

6 A. Yes. Andy, yes. Andy is --

7 Q. Who is Andy?

8 A. Huh?

9 Q. Who is Andy?

10 A. He used to work for I think Hovbilt.  
11 He was --

12 Q. Okay.

13 A. -- an architect, and he took care of,  
14 he was supposed to take care of the building  
15 instead of me, and then he left and it got dumped  
16 on me.

17 Q. So the only one with signature  
18 authority over the Hovbilt accounts now is you?

19 A. Not Hovbilt. HovSat.

20 Q. Thank you. Some of the Omniverse  
21 payments were sent to Hovbilt rather than HovSat.  
22 Do you know why that occurred?

23 A. They were sent where?

24 Q. To Hovbilt instead of to HovSat. Do  
25 you know why?

1 Gandolfo

2 A. No.

3 Q. Okay. Do you know what Shant's role  
4 at Hovbilt was?

5 A. No.

6 Q. Do you know what Hovbilt was?

7 A. No.

8 Q. Okay. So we talked about the  
9 finances for a while. Let's talk about the  
10 Village Mall's operations, so we've been talking  
11 about it. What's the Village Mall?

12 A. The office building.

13 Q. Okay. Just because I haven't had a  
14 chance to drive by it, are the offices on the  
15 inside? Are they facing the parking lot?  
16 Describe it for me.

17 A. There is a parking lot, and then  
18 there is the main building, and then there is a  
19 hair salon here, and then there is a separate  
20 building that has a regular doctor and then a  
21 foot doctor in the back.

22 Q. Okay, and you were pointing to one  
23 side of yourself for the hair salon and the other  
24 side of yourself for the doctors.

25 A. Yes. I'm sorry, yes. I'm sorry.



1 Gandolfo

2 Q. That's fine. We're not videotaping,  
3 so I just make these comments so that the record  
4 is clear. It's totally fine.

5 How has the mall changed over the  
6 past ten years? Tell me about how it was  
7 operating before and after Vahak's death, the  
8 dad.

9 A. Well, I only got out there in '08, so  
10 I mean there was nice grass there. There was --  
11 I don't know. They looked -- it looked like a  
12 nice building. Just -- yes, it just looked like  
13 a nice building.

14 Q. Have the tenants changed over time?

15 A. We lost the accountant, Jerry. He  
16 semiretired and joined his thing with somebody  
17 else, so he's not there anymore. The other  
18 tenant on the bottom floor, she lost her business  
19 but still helps me deal with the customers.

20 Q. Okay. What kind of business does  
21 she --

22 A. And the hair salon. We have a new  
23 tenant.

24 Q. Okay, and then who is the one that  
25 lost the job but is still helping you out? What

1 Gandolfo

2 kind of job is that and who is it?

3 A. Joann.

4 Q. Okay. What kind of business did she  
5 have?

6 A. I don't know. I never asked.

7 Q. Okay. If you can't tell what the  
8 business is, maybe that's an indication.

9 After Vahak died, who took over  
10 management of the Village Mall?

11 A. Me.

12 Q. Okay. Did you get instructions from  
13 Shant?

14 A. No. Nina.

15 Q. Okay. What about in the time between  
16 Vahak's death and before Nina came into the  
17 picture?

18 A. I would ask Shant and hit or miss  
19 whether he answered.

20 Q. Okay, and when he answered, would you  
21 follow his instructions?

22 A. Usually.

23 Q. Okay. When would you not follow his  
24 instructions?

25 A. If I thought he was wrong.

1 Gandolfo

2 Q. Okay. Do any instances come to mind?

3 A. Not really.

4 Q. Okay.

5 A. Just I disconnected a telephone line.

6 Q. Okay, and so you reached out to  
7 Shant. He said don't do it, and you did it  
8 anyway?

9 A. Well, he said he didn't see the point  
10 whether it was there or not there, so I was like,  
11 okay. Fine. Whatever.

12 Q. Got it. Okay, so we've seen a lot of  
13 references to Suites 1 and 12 of the Village  
14 Mall. Can you tell me about those?

15 A. I think when his father was alive,  
16 each area was divided into a suite.

17 Q. Okay.

18 A. But I don't know. I just know the  
19 address is 1 Dag Hammarskjold or whatever.

20 Q. And you mentioned the doctor, the  
21 podiatrist, the hair salon, the accountant,  
22 Joann. Are there any other tenants?

23 A. No.

24 Q. Okay. Has Hovbilt paid rent to the  
25 Village Mall ever?

1 Gandolfo

2 A. I don't know.

3 Q. Okay. Do you know of any instance  
4 where Hovbilt was billed for rent?

5 A. No.

6 Q. What about HovSat or Speedus?

7 A. Not for rent.

8 Q. Okay. Were they considered tenants  
9 of the Village Mall?

10 A. I don't know.

11 Q. Who approved tenants like if you were  
12 going to rent out a space?

13 A. When?

14 Q. Let's do first before Vahak died.

15 A. It probably would have been Art.

16 Q. Okay, and then after Vahak's passing?

17 A. Probably me.

18 Q. Okay.

19 A. Those tenants that are there have  
20 been there, except for the hair salon, have been  
21 there since before I got there, so...

22 Q. And then did the tenants ever reach  
23 out to Shant?

24 A. No.

25 Q. What about Nina?

1 Gandolfo

2 A. Yes. I think Dr. Petcu did Nina.

3 Q. Okay. Before 2015 how were they  
4 paying rent?

5 A. In a check.

6 Q. When they wrote the check before  
7 2015, who did they make it out to?

8 A. Vahak Hovnanian.

9 Q. Okay, and then after he died, they  
10 continue to make payments to him, but then it  
11 changed --

12 A. Yes. They still made the payments to  
13 him.

14 Q. And then they switched to HovSat.

15 A. Yes.

16 (KSG Exhibit 7, Document bearing  
17 number USAPROD 728, was so marked for  
18 identification, as of this date.)

19 Q. All right. Give me one second. I  
20 have to find the exhibit.

21 Here we go. I'm going to show you  
22 KSG 007. Do you have a copy of that file in  
23 front of you?

24 A. 7?

25 Q. Yes.

1 Gandolfo

2 A. Yes.

3 Q. Okay, and is this an e-mail --

4 A. That's to Dr. Petcu's wife.

5 Q. I didn't know they were married,  
6 okay. At the bottom kind of right-hand corner,  
7 it says USAPROD 728.

8 A. Yes.

9 Q. And in this e-mail you said, "Hi  
10 Mirela, from now on Shant would like the rent  
11 check made out to HovSat Inc. instead of his  
12 father's name."

13 Is that the instruction you gave the  
14 tenants to change the name on the rent checks?

15 A. Yes, but that wasn't -- that's really  
16 kind of a lie, because I never spoke to Shant  
17 about it. I just --

18 Q. Okay.

19 A. -- said his name, because Dr. Petcu's  
20 wife didn't want to take my word for it.

21 Q. And she --

22 A. So --

23 Q. -- wanted Shant's word for it?

24 A. Right.

25 Q. Okay. How much rent does the trust

1 Gandolfo

2 collect per year?

3 A. Off the top of my head, I don't know  
4 the number, but I know how much rent is per  
5 month.

6 Q. How much is it per month?

7 A. Well, Petcu pays --

8 Q. In normal times what is it per month?

9 A. Petcu pays \$2,795. The foot doctor  
10 pays 1,105. The hair salon pays 900, but the  
11 lady before that, before she retired, only paid  
12 700.

13 Q. Okay.

14 A. And Jerry, the accountant, before he  
15 left, was paying 1600. I can't add all that in  
16 my head.

17 Q. I'm doing it right now. About  
18 70,000-ish per year? 75?

19 A. I don't know.

20 Q. Okay. What did you do with the  
21 75,000 per year?

22 A. Excuse me?

23 Q. Sorry. Let me rephrase it. What did  
24 you do with the money you collected from the  
25 rent?

1 Gandolfo

2 A. I used it to pay the bills.

3 Q. Okay, and are the tenants responsible  
4 for their own utilities or is the Village Mall?

5 A. Okay. The way Art set it up was  
6 there's the meters in the main building, okay?

7 Q. Yes.

8 A. All those bills would get added up,  
9 and then a percentage would be charged to Jerry.  
10 For some reason Joann was also supposed to be  
11 billed, and then the office. I changed it to  
12 office. I don't know what Art was doing, but I  
13 just did it one thing.

14 Q. Okay.

15 A. And the doctors, the bills are in Dr.  
16 Petcu's name, and what -- I've got her to do  
17 every three months she'll take the water, sewer  
18 and the electric and add it all up, and then she  
19 divides it between her and Grill, Dr. Grill, the  
20 foot doctor, and then she takes Dr. Grill's  
21 amount off her rent check, and then I have to  
22 bill Dr. Grill.

23 I know, it's very convoluted. I  
24 don't -- I didn't understand why. I couldn't get  
25 a straight answer, so that's the way it's done.



1 Gandolfo

2 Q. Okay, but the short answer for that  
3 is the utilities are included in as part of the  
4 rent. It's not like --

5 A. No.

6 Q. They get billed for the rent and the  
7 utilities. The rent is not all inclusive.

8 A. Correct.

9 MR. KUNOFSKY: Okay. Let's take just  
10 a short break, like a two-minute break.

11 THE WITNESS: Okay.

12 MR. KUNOFSKY: Thanks.

13 (Recess taken)

14 BY MR. KUNOFSKY:

15 Q. Hi, Karen. You understand you're  
16 still under oath, right?

17 A. Yes, sir.

18 Q. Okay. Did Shant have office space in  
19 the Village Mall?

20 A. He'd come in and use a desk.

21 Q. Okay.

22 A. It wasn't an office.

23 Q. Okay.

24 A. It was a desk.

25 Q. Where was the desk?

1 Gandolfo

2 A. Outside of my office.

3 Q. Okay. Sorry for playing this game.  
4 Where was your office, Shant's office and Vahak's  
5 office? How did that all get --

6 A. On the second floor.

7 Q. Okay. Was there anything else on the  
8 second floor?

9 A. Conference room and a little  
10 kitchenette.

11 Q. Okay. Was there a shower or anyplace  
12 for Shant to --

13 A. Yes. In Vahak's office.

14 Q. Okay. Did Shant ever pay rent for  
15 using office space either as an office or as a  
16 residence?

17 A. I don't think so.

18 Q. Okay. Would that have shown up on  
19 the QuickBooks if he did?

20 A. I don't know.

21 Q. Okay. Do you know if Shant had a  
22 checking account of his own that he could have  
23 written checks from to you?

24 A. No, I don't know.

25 (KSG Exhibit 10, Document reflecting

1 Gandolfo

2 Affinity Federal Credit Union checks, was  
3 so marked for identification, as of this  
4 date.)

5 Q. Okay. Can you take a quick peek at  
6 these checks written on the HovSat bank account.  
7 It's KSG 10, and I can put it up if you'd like me  
8 to. I'll put it up anyway.

9 A. What am I looking at?

10 Q. So this is a page from the production  
11 we got from Affinity Federal Credit Union on page  
12 1415. What are these Verizon GV checks?

13 A. Oh, Grand View.

14 Q. Okay, and then the third check is  
15 check 2204. It says New Jersey Water.

16 A. That's the office.

17 (KSG Exhibit 9, TD Bank check, was so  
18 marked for identification, as of this  
19 date.)

20 Q. Okay. I see. Okay, and then if we  
21 go to KSG 9. KSG 9 is the exhibit, and it's a  
22 check from TD Bank, page 206, so what's this  
23 check?

24 A. This is for the elevator. I had to  
25 have it reinspected because it wasn't -- it

1 Gandolfo

2 didn't pass inspection the first time, and I had  
3 to pay a lot of money to these people to come  
4 back and try and fix it. And then the guy from  
5 the state came, and I had to pay him again.

6 Q. Okay. What does it mean up on the  
7 right-hand corner of this check where you wrote  
8 in Hovnanian --

9 A. Because the actual bill came in  
10 under -- I think it's still under his dad's  
11 name. I don't remember, so I had to write  
12 Hovnanian on it so that they would -- I always  
13 try and make sure that I have a little bit more  
14 information on a check if the name of the bank  
15 account isn't the same as what it's paying.

16 Q. Okay, and --

17 A. I don't want any issues.

18 (KSG Exhibit 11, e-mail from Karen  
19 Gandolfo to Nina Hovnanian with list of  
20 expenses of June 24th, 2020, was so marked  
21 for identification, as of this date.)

22 Q. It makes sense. And then let's look  
23 at KSG 11, and this is an e-mail you sent to Nina  
24 with a list of expenses on June 24th, 2020.

25 A. Yes.

1 Gandolfo

2 Q. Okay. Why did you send her that  
3 list?

4 A. Because the bank account was low, and  
5 I needed some money, and then she asked me to  
6 give her a list of the expenses, so I did.

7 Q. Okay.

8 A. At least I think that's why I sent it  
9 to her. She could have just asked me for what do  
10 I need to pay this month.

11 Q. Okay. Is this something you printed  
12 out from QuickBooks or is this something --

13 A. No. I just typed it up.

14 Q. -- you did on another program?

15 A. Yes.

16 Q. Okay.

17 A. It's a Word document.

18 Q. Okay. I guess why did you give her  
19 expenses for both trusts?

20 A. I don't remember. Either one or both  
21 accounts needed money, I don't know, or maybe she  
22 just wanted to know.

23 Q. Okay.

24 A. I just don't remember. I'm sorry.

25 Q. Okay. That's fine. All I'm asking

1 Gandolfo

2 for you is what you know. All right, so on the  
3 right-hand side there are six accounts.  
4 QuickBooks, that's to pay for the QuickBooks  
5 online for --

6 A. Everybody.

7 Q. And Kevin gas, what's Kevin gas?

8 A. Kevin gets a gas check like \$150  
9 maybe every week or, you know, for traveling back  
10 and forth. That was an arrangement they had when  
11 Art was here, so I don't know.

12 Q. Okay, and then Kevin pay is the pay  
13 to Kevin Morrison?

14 A. Yes.

15 Q. And then AP?

16 A. The accounts payable. Like whatever  
17 the individual -- like Verizon, JP&L, whatever, I  
18 just lumped it all into one.

19 Q. And then "KG pay needed in Chase."

20 A. Yes.

21 Q. That's your pay?

22 A. Yes.

23 Q. Okay, and then Direct TV is 2300.

24 A. Yes. That's every month for the  
25 senior building.

1 Gandolfo

2 Q. For providing the cable to the senior  
3 building?

4 A. Yes.

5 Q. Okay. For Pachava it's got \$897  
6 worth of expenses.

7 A. Yes.

8 Q. \$898 worth of expenses, and that's  
9 mostly electric, gas and garbage?

10 A. Yes.

11 Q. Okay. How have you been paying those  
12 expenses since you sent this list to Nina?

13 A. Well, all the accounts for Pachava,  
14 the utilities are supposed to be automatically  
15 deducted from the Pachava account.

16 Q. Okay.

17 A. But every now and then for some  
18 reason I have to go log in to the electric or the  
19 gas to manually click the account that it's  
20 supposed to come out of. I don't know why it  
21 doesn't stay. I can't figure it out. And  
22 because I'm not on there, they won't answer me,  
23 so I just do it.

24 Q. These two numbers are monthly, the  
25 900 and the 1500, 1600?

1 Gandolfo

2 A. Yes. That's I guess for that month,  
3 June.

4 Q. Okay, so --

5 A. Electric and the main house looks a  
6 little small.

7 Q. Okay, and how have they been funding  
8 the 900 bucks a month for Pachava? What money  
9 are they using?

10 A. I don't know.

11 Q. Okay.

12 A. I know she asked me to I think one  
13 time loan Pachava out of the VSH money or maybe  
14 it was HovSat. I don't know. I don't remember.  
15 But once she asked me to do that, and I did, and  
16 then I don't know where that money comes from.

17 Q. Has the loan been repaid?

18 A. I don't know. I should have kept  
19 track and I didn't.

20 Q. Okay. Did she say how long it would  
21 take to repay?

22 A. No, but I think it all kind of worked  
23 out when I had the parking lot built, so...

24 Q. And what happened with the parking  
25 lot?



1 Gandolfo

2 A. I ran out of money in the trust, so I  
3 think she -- yes, she put money into my operating  
4 account from Pachava.

5 Q. Okay.

6 A. I think it all washed.

7 Q. Okay.

8 A. I'm pretty sure it all washed.

9 Q. And did Nina tell you that money was  
10 going to be repaid when she asked for the loan?

11 A. Yes.

12 Q. The payment terms?

13 A. Yes. I'm pretty sure she did.

14 Q. What payment terms did she tell you?

15 A. She didn't.

16 Q. Okay.

17 A. It says something -- what?

18 Q. At some point all repaid this?

19 A. Yes. I think -- I don't remember  
20 exactly, so I just know that she said at some  
21 point we got paid back, so I don't know if those  
22 were her exact words. Something was said.

23 Q. Other than the bank statements that  
24 would show the transfer of money, the check and  
25 the transfers on QuickBooks, would there be any

1 Gandolfo

2 other records of this loan?

3 A. No.

4 (KSG Exhibit 12, Document bearing  
5 number Affinity FCU1703, was so marked for  
6 identification, as of this date.)

7 Q. Okay. I'd like to look at KSG 12.  
8 These are some more checks and they are from --  
9 sorry if I'm kind of flying around here. It is  
10 on page Affinity FCU1703 to 1769 and 68, so it's  
11 three pages taken out of the --

12 A. Okay.

13 Q. -- HovSat bank account records.

14 A. Okay.

15 Q. Okay. All right, and here is a  
16 check. Check number is 3152 from 2018. Is this  
17 you paying Full Circle Lawn Care from HovSat for  
18 the house?

19 A. Correct.

20 Q. Okay. Who told you to write the  
21 check or why did you write the check?

22 A. I wrote the check because I had no  
23 access to Pachava, so it needed to be paid. They  
24 were calling --

25 Q. Okay.

1 Gandolfo

2 A. -- all the time.

3 THE COURT REPORTER: They were  
4 calling what?

5 Q. Okay.

6 THE WITNESS: They were calling on  
7 the phone, me.

8 Q. Okay, and then did Nina or Shant okay  
9 that payment?

10 A. It's possible I told Nina or I just  
11 did it myself.

12 (KSG Exhibit 13, Document bearing  
13 number Affinity FCU1596, was so marked for  
14 identification, as of this date.)

15 Q. Okay. All right. Let's go to KSG 13  
16 which is Affinity FCU1596, 1597, 1668, 1669,  
17 1670, 1671, and it keeps on going from there.  
18 This first check from HovSat, check 3644, do you  
19 see that check?

20 A. Yes.

21 Q. And it's to First Unum Life? Unum?

22 A. Yes.

23 Q. And the memo line says Speedus. What  
24 is that check for?

25 A. My life insurance with the company.

1 Gandolfo

2 Q. Okay. Does anybody else have life  
3 insurance with Speedus?

4 A. I think Shant's name is still on that  
5 bill.

6 Q. Okay.

7 A. I wasn't told to take it off, so I  
8 left it there.

9 Q. So it's your life insurance, not  
10 Shant's?

11 A. Yes. That one I think is mine.

12 Q. Does Shant have his own life  
13 insurance?

14 A. No. It's both under First Unum, but  
15 that must have been -- I must have shortchanged  
16 them by \$12.42, because normally it's  
17 140 something dollars a month, or 160, I think  
18 it's up to now.

19 Q. Okay. It happens. All right. I  
20 want to look at the printouts you gave me for  
21 some of the QuickBooks. I haven't had a chance  
22 to look in detail through the Excel files you  
23 sent that we received yesterday, but I got the  
24 general -- I've got the pdf versions of the  
25 balance sheet and the profit and losses.

1 Gandolfo

2 Do you know why Grand View, HovSat  
3 and the Village Mall's finances were all  
4 intertwined within one QuickBooks file?

5 A. No clue.

6 Q. Okay.

7 A. I don't know.

8 Q. Okay. How could you tell when stuff  
9 was related to the trust or related to Grand  
10 View?

11 A. Which trust, Pachava or the VSH?

12 Q. VSHPHH.

13 A. Well, I haven't gotten around to  
14 changing all the names from whatever they were  
15 originally to the trust.

16 Q. Okay.

17 A. And the main reason is because when  
18 all of this was set up, I wasn't a blip on the  
19 screen, so I'm having trouble trying to prove  
20 that it's okay to change the name, but everything  
21 else still stays the same.

22 Q. Okay.

23 A. So if the bill is addressed to Grand  
24 View or it's addressed to HovSat, whoever it's  
25 addressed to, it still all gets paid out of the

1 Gandolfo

2 trust unless it's the house, and then I have to  
3 figure out is that supposed to -- am I supposed  
4 to pay this or is it -- I'm supposed to send it  
5 to Nina and have Nina send it to that girl  
6 Jennifer or whatever her name is.

7 Q. The banker at Morgan Stanley?

8 A. Yes.

9 (KSG Exhibit 14, Balance sheet, was  
10 so marked for identification, as of this  
11 date.)

12 Q. Okay. I've got a couple of questions  
13 about this. I'm going to show you the balance  
14 sheet. It's KSG 14.

15 A. Okay.

16 Q. All right. I guess under other  
17 current assets, there is a lot of money due  
18 from --

19 A. Yes.

20 Q. -- due from Hovnanian companies. Can  
21 you just go through them and explain what each of  
22 those is or what that number represents?

23 A. Well, the only one I really -- those  
24 accounts were all in there. The due from the  
25 mall might be from me, like posting a bill or

1 Gandolfo

2 payment, you know, like if I paid something due  
3 from the mall.

4 Q. Okay.

5 A. You know, but all that was in there  
6 before. I don't know what those numbers mean.

7 Q. Okay. What was Hov Store, or is Hov  
8 Store?

9 A. That was a storage place. I don't  
10 remember the street that it was on. Maybe  
11 Cannonball. I don't know. It was a storage  
12 place. It wasn't far from the office.

13 Q. Okay. What is TFS, due from TFS?

14 A. That would be I think Tinton Falls  
15 Senior.

16 Q. Okay, and that's the storage with the  
17 cable?

18 A. Yes. That's the senior home with the  
19 cable.

20 Q. All right. Thank you. And APH up  
21 here above in the accounts receivables.

22 A. I think that's Art.

23 Q. Okay. Wait. It's an account  
24 receivable, but it's negative, so do you know why  
25 Art was --

1 Gandolfo

2 A. No.

3 Q. -- putting in money?

4 A. No.

5 Q. Okay, and then there are some  
6 liabilities. We saw on page 1 there was an entry  
7 for Adelphia Sewer owed some money, and then here  
8 there is an entry for Adelphia Sewer being  
9 owed --

10 A. I don't even know what Adelphia Sewer  
11 is.

12 Q. Okay, and then do you know what the  
13 liability to Hovbilt of a million dollars is?

14 A. No.

15 Q. Okay, and then below that, there is a  
16 negative amount that's due to shareholder. Do  
17 you know who the shareholder is?

18 A. No.

19 Q. Okay. Do you know why there is a  
20 negative liability?

21 A. No, I don't know what any of this is.

22 Q. Okay. That's okay. Who would know?

23 A. I don't know.

24 Q. Okay. Would Shant know?

25 A. What?



1 Gandolfo

2 Q. Would Shant have known?

3 A. I doubt it.

4 Q. Art?

5 A. That might be a possibility. I don't  
6 know.

7 Q. And just so I've got it, when did you  
8 take over control of the QuickBooks files?

9 A. When Art left.

10 Q. Okay.

11 A. I guess in 2011. Whenever.

12 Q. Okay, so here is 2012. It's on page  
13 6. Looking at the other current liabilities, do  
14 you know why Grand View would be transferring a  
15 hundred thousand dollars to Zargis?

16 A. No.

17 Q. Can you explain any of these account  
18 payables or, sorry, current liabilities?

19 A. No.

20 Q. Okay.

21 A. Some of the due to Village Mall might  
22 be from the AP, but other than that, I don't  
23 know.

24 Q. What do you mean by that?

25 A. Like with the insurance thing you

1 Gandolfo

2 had, the First Unum, I told you that it's a  
3 Speedus, so that would go due from Speedus.

4 Q. Okay.

5 A. So it's possible I might have put  
6 stuff in there, because it was under there in the  
7 first place.

8 Q. And then so you'd pay Speedus's bill.  
9 You'd record it as a due from Speedus.

10 A. Yes, but nothing really happens.

11 Q. Okay, and then sometimes we see  
12 Speedus in here as SPDE?

13 A. Um-hum.

14 Q. Is that the same thing? Is  
15 Speedus --

16 A. Yes. Yes.

17 Q. All right, so if you go to page,  
18 let's say 8, there are amounts, so Zargis is due  
19 \$213,000. Do you know why that happened in 2015?  
20 Karen?

21 MR. KUNOFSKY: John, is Karen okay?  
22 Elza, is everything okay over there?

23 THE COURT REPORTER: I think -- it  
24 says connecting to -- you're both on mute,  
25 Ms. Grigoryan and Mr. Hanamirian.

1 Gandolfo

2 MS. GRIGORYAN: Hi, can you hear me?

3 THE COURT REPORTER: Yes.

4 MR. KUNOFSKY: Yes.

5 MS. GRIGORYAN: Hi, so Karen's screen  
6 is reconnecting right now.

7 MR. KUNOFSKY: Okay. We'll take a  
8 short break. When she comes back, we'll  
9 jump back in.

10 MS. GRIGORYAN: Okay. What time?

11 MR. KUNOFSKY: Two minutes. Do you  
12 think two minutes would be good enough to  
13 get her back on?

14 MS. GRIGORYAN: Yes. I think so,  
15 yes. Yes.

16 MR. HANAMIRIAN: Okay.

17 MS. GRIGORYAN: I'll pop in when it  
18 reconnects.

19 MR. HANAMIRIAN: Thanks.

20 (Recess taken)

21 BY MR. KUNOFSKY:

22 Q. Karen, welcome back. You understand  
23 you're still under oath?

24 A. Yes.

25 Q. Great. Generally when we look at

1 Gandolfo

2 these current liabilities on the Grand View  
3 balance sheets, if I were to say that you  
4 basically just entered something in for the  
5 company, if you were paying one of its bills  
6 you'd put it in as a due from those companies?

7 A. Yes.

8 Q. Okay. All right. Let's look at page  
9 12 of this file. There is one here for, and then  
10 when it was due to, was that the opposite, you  
11 got money from that entity, and the Village Mall,  
12 Grand View, had to pay it back?

13 A. I think so.

14 Q. Okay, so here is one that says due to  
15 HJH Trustee. Who is that or what's that?

16 A. I probably put that in there because  
17 it came from Hilde, and I didn't know what  
18 account it actually was. I just know that I saw  
19 Hilde's name probably on the statement.

20 Q. Okay.

21 A. But I don't remember why I did that.

22 Q. Do you know why you were getting  
23 money from Hilde as trustee?

24 A. No.

25 Q. Okay. Let's jump a little. Let's go

1 Gandolfo

2 to page 27. Okay, so the Grand View Cable  
3 balance sheet for 2019, it still shows due to  
4 Hilde five years later of \$2,000. Do you see  
5 that?

6 A. Um-hum.

7 Q. So in five years nothing was paid  
8 back to the trust?

9 A. No.

10 Q. And then below that, there are two  
11 entries for Hovbilt. Do you know why? One says  
12 Hovbilt, one says Hovbilt-TD Bank, and one is a  
13 million dollars and one is five grand. Do you  
14 know why?

15 A. Well, the first one I don't know  
16 anything about. I've never really -- I never put  
17 anything to or from Hovbilt.

18 Q. Okay.

19 A. The due to Hovbilt TD Bank is, I  
20 think that's the bankrupt account when he put  
21 Hovbilt into bankruptcy.

22 Q. And who is "he" there?

23 A. Shant.

24 Q. Okay, and we'll see below that, there  
25 is an entry that I've now highlighted to make

1 Gandolfo

2 sure I'm lining these things up, right, due to  
3 the VSHPHH trust, 15,000.

4 Well, I guess my first question is  
5 why is there a separate entry for VSHPHH if they  
6 are being treated as one and the same?

7 A. I did that for me.

8 Q. What do you mean?

9 A. I was just so confused that I just,  
10 when they opened the bank account, I made a  
11 separate account like --

12 Q. Okay.

13 A. -- I don't know where it is, but it's  
14 in there.

15 Q. I missed it. So when the VSHPHH  
16 first opened its account at TD Bank, you then set  
17 up a separate account for VSHPHH Trust in this  
18 QuickBooks file?

19 A. Yes, because I was trying to keep  
20 track. I don't know whether I actually can tell  
21 you exactly what that is or not. I probably have  
22 to figure it out, but --

23 Q. Okay.

24 A. -- I don't know. I don't know  
25 whether it's a bill I paid or money I moved. I

1 Gandolfo

2 don't know. I don't remember.

3 Q. Okay, and then the amount to Zargis  
4 has increased. Do you know why that amount  
5 increased?

6 A. Maybe that's from all the QuickBooks.  
7 I don't know.

8 Q. Okay. Does anybody else have access  
9 to the Grand View QuickBooks page? Is it just  
10 you?

11 A. As far --

12 Q. Does anyone have access to Grand View  
13 on QuickBooks?

14 A. See, I changed the user name, so I  
15 don't know, but I was using Art's log-in.

16 Q. Okay.

17 A. So I don't think anybody else has  
18 access. I gave Elza to try and help me with  
19 whatever you needed, but --

20 Q. Right, and that's --

21 A. But I gave her my log-in.

22 Q. Okay. All right. Before we go off  
23 of this, so looking at the Grand View P&L on page  
24 28 of this printout that was sent to me in pdf  
25 format, we talked about data center service

1 Gandolfo

2 revenue, and you said Shant told you to put that  
3 for the Omnibox, or Omnibox --

4 A. The data center service revenue.

5 Q. Okay. What is the subscription  
6 income underneath that?

7 A. What's what? Oh, I don't know. I  
8 don't know what that is.

9 Q. Karen, I just pointed at my screen to  
10 show you where it was.

11 A. I know, but I saw it. I saw it.

12 Q. Okay.

13 A. I don't know what that is.

14 Q. Okay. Where is the cable, the senior  
15 center cable income? How is that recorded here?

16 A. Okay.

17 Q. Do I need to go another year? Would  
18 that help?

19 A. When you -- all right. When the ACH  
20 gets put on the customers, we have customers who  
21 it automatically gets debited out of their  
22 accounts.

23 Q. Right.

24 A. And then we have customers who pay  
25 us, you know, just a few of them pay still in



1 Gandolfo

2 check or money order, okay? So if they pay in  
3 check or money order, it goes straight into the  
4 TD Bank account.

5 Q. Okay.

6 A. Okay? The ACH people, when I took  
7 over, it kept -- it went into this thing called  
8 undeposited funds.

9 Q. Yes.

10 A. I don't know why it goes in there.

11 Q. Okay.

12 A. But I think I set up a separate one  
13 just starting when the VSH Trust opened, because  
14 I wanted to try and do the bank recs, and that  
15 money doesn't go as money into the account. I  
16 don't know where it is.

17 Q. Okay.

18 A. Okay, but I have to credit the  
19 customers, so, you know, that they paid their  
20 bill, okay? So I put it in, it should be  
21 recorded in two accounts called undeposited  
22 funds.

23 Q. Okay.

24 A. I don't reconcile it. I don't do  
25 anything. It just goes in there.

1 Gandolfo

2 Q. Okay.

3 A. And I've learned how to do the bank  
4 rec for the trust, the VSH Trust. I've done that  
5 with some help from my son's girlfriend.

6 Q. Okay.

7 A. I didn't know how to do it before, so  
8 she helped me figure it out. I just had been --  
9 I didn't do the last, these past two months  
10 because there is too much going on.

11 Q. Okay, so if we look at this, there is  
12 a \$75,000 legal fee seems to be the largest  
13 expense. Do you know what that was for?

14 A. No.

15 Q. Okay. 39,000 for consulting in this  
16 2019 P&L?

17 A. That's Kevin. Kevin gets paid under  
18 consulting now.

19 Q. Okay. 5,000 for medical?

20 A. I fell at Shant's house and I cracked  
21 my tooth, so that is -- at the kid's house, so I  
22 had a big dental bill, and I didn't have -- I  
23 asked Nina -- I told Nina about it, and Nina gave  
24 me \$5,000 to pay for it, the implant I had to  
25 get.

1 Gandolfo

2 Q. Sorry to hear that. Okay.

3 A. Yes. I survived.

4 (KSG Exhibit 15, Village Mall balance  
5 sheets and profit and loss statements, was  
6 so marked for identification, as of this  
7 date.)

8 Q. Okay. Let me back up. KSG 15 is the  
9 Village Mall balance sheets and P&L's, profit and  
10 loss statements. How did you separate those from  
11 Grand View?

12 A. Well, the only thing that got --  
13 okay, the only thing that was ever -- that I ever  
14 deposited into Village Mall were the rent  
15 checks --

16 Q. Okay.

17 A. -- originally, because it was at the  
18 Affinity bank or whatever, and I would deposit  
19 those checks into there, and then like when the  
20 J, like the electric bill.

21 Q. Yes.

22 A. Okay, because the tenants are listed  
23 in here are in the Village Mall.

24 Q. Right.

25 A. I would, you know, like I would put

1 Gandolfo

2 that they paid, right? And then when the JC,  
3 like the electric bill came in for the building,  
4 apparently when I took over it was supposed to  
5 get paid out of the Village Mall account, but I  
6 didn't -- I couldn't sign anything on that  
7 account, so it always had to get paid out of the  
8 HovSat account or what's now the trust account.

9 Q. Okay.

10 A. But I would still enter the bills in  
11 here. I only recently stopped doing that.

12 Q. Okay.

13 A. So that this way when I entered like  
14 the JCP&L, the electric bill in here --

15 Q. Yes.

16 A. -- okay, when I enter it, you know,  
17 it would say should it be billed or there's like  
18 little boxes.

19 Q. Yes.

20 A. Okay, so Jerry, the accountant, I  
21 would bill his, and I would -- but I would still  
22 break down for Joann and the office.

23 Q. Okay.

24 A. Neither Joann nor the office ever  
25 paid any amount into it. I just followed what

1 Gandolfo

2 they did.

3 Q. Okay. How did you --

4 A. And Jerry is not there anymore, so I  
5 don't enter it. He left I think last August or  
6 September or something.

7 Q. Okay, so these start back at 2011.  
8 Did you recently separate these two accounts,  
9 Grand View and Village Mall, or were they always  
10 separate?

11 A. No. They were always separate.

12 Q. Okay.

13 A. I didn't create this.

14 Q. Okay, so in here there are loans. Do  
15 you know what due to APC is?

16 A. What?

17 Q. Sorry. ASC. There is a long-term  
18 liability due to ASC. Do you know what that is  
19 for or what that is?

20 A. No. I have no idea.

21 Q. Due to ISP?

22 A. No.

23 Q. Hovbilt loan?

24 A. No clue.

25 Q. And then --

1 Gandolfo

2 A. I don't know what any of that is.  
3 The only thing that I ever did in Village Mall,  
4 like I said, was I deposited, when the account  
5 was active, the bank account was active, I  
6 deposited the money into the bank, and then I  
7 would, you know, like I said, I would -- even  
8 though I paid the electric out of the HovSat  
9 account or trust account, I would then, you know,  
10 just put it in here in order to bill the tenant  
11 for his electric. That's it.

12 Q. So the first two years that we have  
13 here, the P&L for 2011, 2012, there are all these  
14 expenses related to household. Do you see them?  
15 They say household insurance, household  
16 landscaping, household telephone, household  
17 mortgage.

18 A. Okay.

19 Q. Do you know which household these are  
20 for?

21 A. No.

22 Q. Okay. Do you know why the Village  
23 Mall would be paying a household mortgage,  
24 household telephone, household landscaping,  
25 household insurance?

1 Gandolfo

2 A. No.

3 Q. In 2013 these expenses go away, and  
4 you don't see them again. Presumably they  
5 stopped paying these expenses. Do you know why  
6 the Village Mall stopped paying these expenses?

7 A. No, because I don't even, I don't  
8 know what they were.

9 Q. Okay. I'm going to have to kind of  
10 break this up into two screens. Give me a  
11 second. So there are a lot of times when the  
12 Grand View and the Village Mall expenses don't  
13 line up, so we might see \$400 due from the mall  
14 to Grand View on Grand View's balance sheet and  
15 nothing showing the Village Mall owes Grand View  
16 on the Village Mall's balance sheet. Do you know  
17 why that discrepancy exists?

18 A. No.

19 Q. Okay. Did you ever compare what was  
20 in the Grand View file and the Village Mall files  
21 to make sure that they tied together or  
22 reconciled and matched?

23 A. No.

24 Q. Okay. Why not?

25 A. First off, I didn't know I was

1 Gandolfo

2 supposed to.

3 Q. Okay.

4 A. Secondly, I don't know how. I  
5 told -- I explained to you, I had no training in  
6 this. I don't even know what I'm looking at.

7 Q. Okay. That's fine. I'm not accusing  
8 you of anything. I just wanted to get the  
9 answer. All right. Let's look at our last  
10 exhibit for the day.

11 (Recess taken)

12 BY MR. KUNOFSKY:

13 Q. Karen, you understand you're still  
14 under oath, right?

15 A. Yes.

16 (KSG Exhibit 16, Document reflecting  
17 QuickBooks account, was so marked for  
18 identification, as of this date.)

19 Q. Great. Let's look at KSG 16. All  
20 right, so on this first page of this 118-page  
21 exhibit we've highlighted some expenses from the  
22 VSHPHH Trust for accounting fees, and they say  
23 QuickBooks.

24 A. Yes.

25 Q. Are these QuickBooks that you paid



1 Gandolfo

2 for?

3 A. Yes.

4 Q. All right. On the bottom one there  
5 from 1/20/2020, it says QuickBooks Zargis and  
6 then it's split to due from Speedus. What does  
7 that mean?

8 A. The QuickBooks account has Speedus  
9 and Zargis in it the same way that HovSat and the  
10 Village Mall are, but it's billed under Speedus,  
11 so that's what I put it under.

12 Q. How did you know to do that?

13 A. It was there.

14 Q. Okay, and you've never made any  
15 entries to either the Speedus or --

16 A. Well, the thing that I did was I  
17 added the Zargis, because there were so many of  
18 them. I couldn't keep track of them, so like the  
19 next one on the 11th, it says, you see where it  
20 says SPDE?

21 Q. Yes.

22 A. Yes. I did that.

23 Q. Okay.

24 A. So --

25 Q. You haven't taken anything from any

1 Gandolfo

2 bank accounts and put it in any loans, transfers,  
3 anything like that, and entered it into these  
4 QuickBooks files?

5 A. Say that again.

6 Q. You haven't done anything with these  
7 QuickBooks files, the Speedus and the Zargis  
8 ones, have you?

9 A. No. No.

10 Q. Do you know if anyone else has access  
11 to the Speedus and the Zargis QuickBooks files?

12 A. I don't think so.

13 Q. Okay. Did you get the password and  
14 user names from Art?

15 A. Not for Zargis. I got it from Peter  
16 Glen.

17 Q. Okay. There is an entry for  
18 Gracenote Media. What is that?

19 A. That was the TV guide that we used to  
20 broadcast. It was like 500 and change a month or  
21 something, yes, so I got rid of it.

22 Q. Like a scrolling list of channel  
23 selection when you see --

24 A. Yes. You know, like you see on any  
25 cable like Optimum, you know, there is a channel

1 Gandolfo

2 guide.

3 Q. Yes.

4 A. There is an actual channel that says  
5 channel guide.

6 Q. Right.

7 A. Okay. That's what that was, and I  
8 didn't see a need for it, so I got rid of it.

9 Q. Okay.

10 A. It was too much money.

11 Q. Okay. There is a travel expense for  
12 you from February.

13 A. Yes.

14 Q. Why were you traveling?

15 A. Okay. That's because when we moved  
16 out to Freehold, I was promised a company car.  
17 And for a while I was using the company car, but  
18 they, Shant took it back I think because Vahak  
19 needed or Nina needed it, and I ended up using my  
20 car, and the wear and tear on my car, he decided  
21 to pay for my tolls and gas, so that's what that  
22 was.

23 Q. That's a Speedus company car?

24 A. It was, yes.

25 Q. What kind of car was it?

1 Gandolfo

2 A. It was a Cadillac Escalade.

3 Q. What color?

4 A. Black.

5 Q. Okay. Here is an entry for 3/19/2020

6 Hovnanian International deposits, 49800. 600?

7 A. Can you make that a little bit  
8 bigger, please?

9 Q. Yes. I think I need to make it full.

10 A. It's too small, yes.

11 Q. \$49,980. Do you know why Hovnanian  
12 International was paying Village Mall 50 grand?

13 A. That was because I ran out of money,  
14 and I told her I needed money.

15 Q. Okay, and that's what we talked about  
16 earlier?

17 A. Yes.

18 Q. Okay. Just to kind of streamline  
19 this, there are a lot of other entries where it  
20 says Karen travel. That's reimbursing your  
21 commute?

22 A. Yes.

23 Q. Okay.

24 A. Correct.

25 Q. Okay. On page 2 there is an entry,

1 Gandolfo

2 Sprint due from Speedus. Why is HovSat paying  
3 for Speedus's Sprint bill?

4 A. Okay, because that's my cell phone,  
5 that's a company cell phone. It's the only phone  
6 I've got, so and we don't have any office phones,  
7 any landlines in the office, so they pay for it,  
8 but the bill is under Speedus with my name, and  
9 so that's the way I booked it.

10 Q. JCPL v. Hovnanian electric house 520  
11 NRR, and then it's billed as due to Pachava.

12 A. Pachava, yes.

13 Q. Pachava. Sorry.

14 A. Nina asked me to pay the house's  
15 electric bill, so I paid it.

16 Q. Okay, and same with the garbage  
17 pickup?

18 A. Correct.

19 Q. Okay, and here is another one due for  
20 the landscaper. That's another one where you  
21 were covering or, sorry, the Grand View Cable,  
22 Village Mall, HovSat was covering the house's  
23 landscaping?

24 A. Correct.

25 Q. Okay, so when I see 520 NRR, that's

1 Gandolfo

2 the house?

3 A. Yes.

4 Q. Okay. All right. We're on page 6 of  
5 KSG 16. I see a cash expense of \$5,000 for  
6 Hovbilt, and then another one ten days later to  
7 Hovbilt for 5,000, and then another one for  
8 2600 that same day. Do you know why Grand View  
9 HovSat was paying Hovbilt this money, why these  
10 transfers of cash were going out?

11 A. No.

12 Q. Okay. Who --

13 A. I don't know.

14 Q. Okay.

15 A. I'm wondering -- I don't know.

16 Q. Yes. No. Take a second. Think  
17 about it. This would have been in 2012, so it's  
18 a while ago. It might take a second to jog your  
19 mind.

20 A. No. It's not ringing any bells. I  
21 thought maybe the amounts might, but I have no  
22 idea. I don't know.

23 Q. Okay. Do you know who would have  
24 done this? Do you know who would have done this?

25 A. I don't know. It might have been

1 Gandolfo

2 Art. It might have been me. I don't -- it's  
3 just not ringing any bells. I have no idea.

4 Q. Okay. Here, 3/16/2012 there was a  
5 deposit from Zargis, and it was then recorded as  
6 due to Zargis. Do you know why that would have  
7 occurred, why Zargis would have paid money to the  
8 Village Mall, HovSat?

9 A. I might have saw that on a bank  
10 statement and just put it in.

11 Q. Okay, but you don't know why the  
12 transfer occurred?

13 A. No.

14 Q. Okay. On 3/19/2012 there is a  
15 deposit from Vahak Hovnanian. I'm assuming  
16 that's the dad, because he was still alive, and  
17 the grandson --

18 A. Yes.

19 Q. -- is still a little kid, right?

20 A. Yes.

21 Q. And it's reported as due to Village  
22 Mall. Do you know what that's supposed to  
23 represent? Well, what's that supposed to  
24 represent?

25 A. I have no idea. I don't know.

1 Gandolfo

2 Q. If these had been loans, would you  
3 have put down loan?

4 A. If I did it, which might be the  
5 case --

6 Q. Right.

7 A. -- if I just saw it on the statement,  
8 that's the only thing I would put. I wouldn't  
9 put -- I wouldn't know whether it was a loan or  
10 not.

11 Q. Okay. Who would know at this point?

12 A. I don't know.

13 Q. Okay. All right. There are all  
14 these payroll checks on 3/28/12. Who are these  
15 people? We talked about Kevin.

16 A. Yes. You know, and Andy Antranik.

17 Q. Okay.

18 A. The other two worked at the storage  
19 place from -- if I remember correctly.

20 Q. The Hov Store?

21 A. Yes.

22 Q. Okay.

23 MR. HANAMIRIAN: Would it have been  
24 Miles and Charles?

25 THE WITNESS: Yes.



1 Gandolfo

2 MR. HANAMIRIAN: Okay.

3 A. Miles and Charles.

4 Q. And then Vahak it looks like made  
5 another deposit. Do we know why?

6 A. No.

7 Q. Okay, and then below that, the  
8 Hartford Priority accounts as a due from Hovbilt,  
9 and then there is an insurance payment. It looks  
10 like three insurance payments. Do you know  
11 why --

12 A. Well, they used to go -- also go  
13 through ADP, so they had a payroll, you know,  
14 they were insurances, because those guys were  
15 covered under those three things like Unum life  
16 insurance. I don't remember what Assurant was,  
17 but the Horizon was their health insurance.

18 Q. Okay.

19 A. And I don't know what -- I don't  
20 remember what the Hartford was either. It's some  
21 sort of -- like it might have been disability or  
22 something. I don't remember.

23 Q. Why isn't Hovbilt paying it out of  
24 its own money?

25 A. I don't know. They don't have an

1 Gandolfo

2 account.

3 Q. Okay.

4 A. A bank account.

5 Q. Hovbilt didn't have a bank account at  
6 that point?

7 A. I don't think so. Not that I'm aware  
8 of.

9 Q. Okay. All right. Let's see. Now,  
10 there are three transfers that say Vahak, but  
11 then they are due to Village Mall or Zargis. Do  
12 you know --

13 A. The Vahak Hovnanian is I think the  
14 actual name on the Village, what we call the  
15 Village Mall account at Affinity.

16 Q. Okay.

17 A. So that's why it says transfer from  
18 the mall to HovSat.

19 Q. Okay.

20 A. That was probably part of the rent  
21 that was collected and moved over for bills.

22 Q. Okay, and then Village Mall, you  
23 don't know what that's for?

24 A. No.

25 Q. Okay. State of New Jersey, third

1 Gandolfo

2 quarter 2011, it says payroll taxes. Who were --

3 A. I didn't do that. I don't know.

4 Q. Okay. For all the other ones in here  
5 for Zargis, transfers from Zargis to HovSat or  
6 HovSat to Zargis, do you not know why those  
7 transfers occurred or why you had those in there?

8 A. Probably because HovSat needed money.

9 Q. Okay. What about this one from Hov  
10 Store on 5/12/2012 on page 10, do you know why  
11 Hov Store transferred money to HovSat?

12 A. I don't know.

13 Q. Okay. Just a couple more. Is it  
14 safe to say that if I show you another one from  
15 Hov Store, it won't trigger any memories for you?

16 A. No.

17 Q. One second. Okay. I'm jumping to  
18 page 35. Okay. On page 35 it shows HJH trustee,  
19 transfer from HJH trustee to HovSat, and it says  
20 due to HJH trustee for \$8,000. We talked about  
21 that earlier, right?

22 A. Right.

23 Q. Okay, and you thought that was the  
24 Hilde trust?

25 A. I don't know whether it was Hilde's

1 Gandolfo

2 trust or whether -- I just labeled that because I  
3 didn't know it actually came from somewhere else.  
4 I think it's just her trust.

5 Q. Okay, and that could be the Pachava  
6 Trust, because at one point she was trustee of  
7 the Pachava Trust, right?

8 A. That's a possibility.

9 Q. Okay, and then here on page 38 on  
10 page 1/30/14 it shows --

11 A. I put it in the wrong place.

12 Q. Okay, so when it says due to  
13 shareholder, it should have gone due to --

14 A. Yes.

15 Q. -- HJH trustee, okay. Mistakes  
16 happen. Rolling quickly. You can tell which  
17 ones I highlight like this versus the ones Cat  
18 highlighted where they are perfect.

19 Okay. Township of Howell on  
20 12/28/15, it's paid real estate taxes of \$27,000  
21 and it says it's for block 143 lot 2504.

22 A. That's the office. That's the  
23 Village Mall.

24 Q. Okay.

25 A. That's the building. That's the

1 Gandolfo

2 property tax.

3 Q. Okay. Is there a property on 572  
4 Wyckoff Lane that you've also paid property taxes  
5 for from the Grand View account?

6 A. I haven't paid anything.

7 Q. Okay.

8 A. I've only paid that one.

9 Q. Okay. In 2016, on page 67 of this  
10 spreadsheet there is Roberts Electronics &  
11 Security Inc., and it shows that they are paying  
12 for, I guess there is an alarm system on the  
13 house or electrical --

14 A. Yes. There is an alarm system. It's  
15 for the whole year.

16 Q. Okay, and that was paid for from  
17 Grand View.

18 A. Well, HovSat, yes. Whatever.

19 Q. Right, and then it's billed as due to  
20 the mall. Why would it be billed that way?

21 A. That's also a mistake. It should  
22 have been Pachava.

23 Q. And then up here on 4/18/2016 there  
24 is another one --

25 A. That also.

1 Gandolfo

2 Q. Another mistake?

3 A. Yes. Well, I don't think -- I don't  
4 remember when I created the due to Pachava, and I  
5 guess in the beginning I just chalked it up to  
6 the mall account, because that was Vahak, the  
7 dad's, bank account.

8 Q. Okay, but here by this point it's  
9 2016, so Vahak had passed by that point, so --

10 A. Yes.

11 Q. -- who was telling you to pay these  
12 bills for the house?

13 A. Probably Nina or I -- I just paid  
14 them.

15 Q. Okay. This was before Nina was  
16 appointed as trustee.

17 A. Then I just paid them. They were  
18 always paid, so I paid them. I didn't -- never  
19 had access to the trust, to the Pachava account,  
20 so I just followed suit. Whatever was done  
21 before is what I continued to do until --

22 Q. Until instructed otherwise?

23 A. Yes, by Nina.

24 Q. Okay, and we had talked about the  
25 real estate taxes. (Inaudible) transfers for

1 Gandolfo

2 real estate taxes, right?

3 A. Excuse me?

4 Q. So we had lots of these payments for  
5 the real estate taxes coming out of Grand View.

6 A. Right.

7 Q. And you had previously talked about  
8 your answer would be the same for all of them,  
9 right?

10 A. Yes.

11 Q. All right, and the same for all the  
12 entries for 5/20. It was you kept on doing what  
13 you needed to do to pay those bills, and so if  
14 you had to pull it from HovSat, you would.

15 A. Yes, because I didn't have access to  
16 Pachava.

17 Q. Okay. Here is one. 10/22/2018, so  
18 by this point Nina had been appointed as trustee  
19 of the Pachava Trust.

20 A. Correct.

21 Q. 10/22/2018, it's on page 103, and it  
22 says Navesink Country Club member ID 813, and you  
23 chalked it up to dues and subscriptions. What is  
24 that for?

25 A. That's the country club she told me

1 Gandolfo

2 to pay.

3 Q. Do you know whose account that is?

4 A. Not offhand.

5 Q. Okay. Did she tell you why she  
6 wanted country club bills paid from this account?

7 A. No, and I didn't ask.

8 Q. Okay. What is QuickBooks DDC,  
9 looking at page 114, on August 15th, 2019?

10 A. That's another company that was I  
11 think under Speedus's umbrella.

12 Q. So it's going to take me a second to  
13 find this file.

14 All right, so I'd like to go back to  
15 KSG 15 just a second and look at page, let's call  
16 it 22. I'm going to make this an exhibit now or  
17 share the exhibit. Tell me when you're there.

18 Ready?

19 A. Yes.

20 Q. All right, so this is the Village  
21 Mall's profit and loss statement for the calendar  
22 year 2017, and it shows profits of 74,000, or net  
23 income, I should say, of \$74,000. For this --

24 A. Okay.

25 Q. -- year or any other year, was that



1 Gandolfo

2 cash ever given to any of the beneficiaries of  
3 the trust, the VSHPHH trust?

4 A. No. Not that I know of.

5 Q. Were the profits of the Village Mall  
6 put back into HovSat during this time, those  
7 companies?

8 A. Yes. Whatever was in, whatever was  
9 collected was in turn either transferred into  
10 HovSat for bills.

11 Q. Okay, and that's true throughout this  
12 time period where we have financials for 2011 to  
13 2020?

14 A. Yes. Well, the Village Mall I don't  
15 have access to anymore. I can't even get on it  
16 online, so I don't know what's in there. I don't  
17 know what's going on with it.

18 Q. When did you find that problem out?

19 A. I don't know. That's been for almost  
20 five years now. I've tried. I tried to log in  
21 one time and it wouldn't let me log in, and the  
22 information -- I tried calling, but they said  
23 because I'm not on the account, I would need to  
24 have the owner of the account, and the owner was  
25 dead, and I didn't say anything, I just hung up.

1 Gandolfo

2 Q. Okay. Do you know who William Read  
3 Rankin is?

4 A. Yes.

5 Q. Who is he?

6 A. He's somehow -- I think he's Shant's  
7 sometime lawyer. I know that I met him when we  
8 were in Brooklyn once, and I know that he's a tax  
9 lawyer.

10 Q. Okay. Do you know if he ever acted  
11 as counsel for any of the companies we talked  
12 about today?

13 A. I don't know.

14 Q. Okay. All right.

15 MR. KUNOFSKY: John, do you have any  
16 questions you want to ask?

17 MR. HANAMIRIAN: Yes. Just one.

18 EXAMINATION BY MR. HANAMIRIAN:

19 Q. Were you ever visited by anybody from  
20 the IRS or Department of Treasury in this matter  
21 or in Shant's tax liability matter?

22 A. Yes.

23 Q. Okay. Who was that and what  
24 happened?

25 A. It was a big guy named, I think his

1 Gandolfo

2 last name is McGilverly. He would periodically  
3 knock on the door, and then I wouldn't let him in  
4 because I didn't know who he was, and I wasn't  
5 going to let him in. So then he went to my  
6 previous tenant, Jerry's, and went through  
7 Jerry's office to the inside office and came up  
8 the stairs and scared me half to death.

9 Q. When was this? About around what  
10 time?

11 A. It was in the summer.

12 Q. Okay. Last year? The year before?

13 A. I think it was the year before.

14 Q. '19?

15 A. Yes.

16 Q. Okay.

17 A. And he came upstairs and harassed me.  
18 I mean seriously I felt bullied and threatened,  
19 because he stood over my desk demanding where  
20 Shant was. And he had some lady with him who was  
21 just looking around, but he kept hammering at me.  
22 And I asked him, I said, who let you in, and he  
23 says, that's not the issue. The issue is where  
24 is Shant Hovnanian. And I said he's not there,  
25 and then he proceeded to throw, he said, these

1 Gandolfo

2 papers, envelopes, and said, here, consider  
3 yourself served, and I said for what, and then he  
4 turned around and went down the stairs. But he  
5 was really intimidated me, and I felt threatened.

6 Q. Did the woman, the female person,  
7 identify herself?

8 A. No. She never did. It was just him,  
9 and then he harassed me one day when I went to  
10 the house to pick up the mail, he started banging  
11 on the door, and I thought he was going to break  
12 the glass, and demanded that I open the door, and  
13 I refused because it's not my house.

14 Q. When was this?

15 A. That was a couple of weeks later or a  
16 month later. And he consistently would be at the  
17 house, you know, on the days that I went to pick  
18 up the mail, and he would sit outside in the  
19 driveway. And then I had to go out the back of  
20 the house the day that he taped the notices to  
21 the handlebars together.

22 But he was very -- I don't -- I was  
23 very, very upset after he left. I had to sit in  
24 the house for two hours, because that's how long  
25 he sat in the driveway, and I didn't want to be

1 Gandolfo

2 harassed.

3 Q. Did you know what he served you with  
4 or when he said you're served, what were you  
5 served with?

6 A. Papers addressed to Shant and to  
7 Nina. I didn't open them.

8 Q. Okay.

9 MR. HANAMIRIAN: I have nothing  
10 further.

11 MR. KUNOFSKY: Give me a two-minute  
12 break to let my dog out and to call Cat to  
13 make sure I don't have any more questions.

14 MR. HANAMIRIAN: Okay.

15 (Recess taken)

16 MR. KUNOFSKY: I don't have any more  
17 questions. We're good. Nothing.

18 MR. HANAMIRIAN: Then we're good on  
19 our side.

20 Thank you, Joe.

21 THE COURT REPORTER: All right.

22 Thank you.

23 THE WITNESS: Thank you.

24 THE COURT REPORTER: All right. Bye.

25 MR. HANAMIRIAN: Bye.

1 Gandolfo

2 MR. KUNOFSKY: Wait. I think that --  
3 can we just have one second here?

4 MR. HANAMIRIAN: Yes.

5 MR. KUNOFSKY: Joe, can we go back on  
6 the record. I apologize.

7 THE COURT REPORTER: Yes. Yes, sure.

8 MR. KUNOFSKY: There were pending  
9 objections and instructions not to answer.  
10 To the extent I need to, I'm going to hold  
11 the deposition open for that specific  
12 purpose.

13 MR. HANAMIRIAN: Yes. Yes. I would  
14 have done that, but, yes. That's fine.

15 MR. KUNOFSKY: Okay.

16 MR. HANAMIRIAN: All right?

17 MR. KUNOFSKY: Thank you.

18 MR. HANAMIRIAN: You're welcome.

19 THE WITNESS: Thank you.

20 MR. KUNOFSKY: Thank you, Karen.

21 (Time noted: 2:52 p.m.)

22

23

24

25

ACKNOWLEDGMENT

I, KAREN GANDOLFO, hereby certify that  
I have read the transcript of my testimony taken  
under oath in my deposition on January 28, 2021;  
that the transcript is a true, complete and correct  
record of my testimony; and that the answers on the  
record as given by me are true and correct.

\_\_\_\_\_  
KAREN GANDOLFO

Signed and subscribed to before me  
this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

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Notary Public

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## I N D E X

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## E X H I B I T S

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\*\*\* ERRATA SHEET \*\*\*

CASE: United States v. Shant Hovnanian, et al.,

DATE: January 28, 2021

WITNESS: Karen Gandolfo

JOB NO.: 1192

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\_\_\_\_\_  
Karen Gandolfo

Subscribed and sworn to before me

this \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Notary Public

C E R T I F I C A T I O N

I, JOSEPH DANYO V, a Shorthand Reporter  
and Notary Public, within and for the State of New  
York, do hereby certify:

That I reported the proceedings in the  
within entitled matter, and that the within transcript  
is a true record of such proceedings.

I further certify that I am not related, by  
blood or marriage, to any of the parties in this  
matter and that I am in no way interested in the  
outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set  
my hand this 12th day of February, 2021.

JOSEPH DANYO V

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